

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on East Suffolk Council's Deadline 12 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited
Document Reference: ExA.AS-6.D13.V1
SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001142

Date: 5th July 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	05/07/2021	Paolo Pizzolla	Lesley Jamieson	Rich Morris

Description of Revisions

Rev	Page	Section	Description
01	n/a	n/a	Final for Submission



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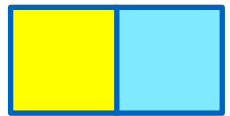
Glossary of Acronyms

AIS	Air Insulated Switchgear
CoCP	Code of Construction Practice
DCO	Development Consent Order
ESC	East Suffolk Council
GIS	Gas Insulated Switchgear
HGV	Heavy Goods Vehicle
ISH	Issue Specific Hearing
LLFA	Lead Local Flood Authority
OLEMS	Outline Landscape and Ecological Management Strategy
OLMP	Outline Landscape Mitigation Plan
SCC	Suffolk County Council
SoCG	Statement of Common Ground
SuDS	Sustainable Drainage Systems



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 substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project / 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 project / East Anglia ONE North project Development Consent Order.
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.
Sustainable Drainage System	A collection of water management practices and measures that aim to align modern drainage systems with natural water processes. This includes, amongst other measures, infiltration and attenuation.



1 Introduction

1. This document presents the Applicants' comments on East Suffolk Council's (ESC) Deadline 12 submissions as follows:
 - ESC's Responses to the Applicants' Deadline 11 Submissions (REP12-084); and
 - ESC's Responses to the Examining Authorities Rule 17 Questions of 18 June 2021 (REP12-083).

2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications), and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 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 East Suffolk Council's Deadline 11 Submissions

2.1 ESC's Responses to the Applicants' Deadline 11 Submissions (REP12-084)

ID	ESC Comment	Applicants' Comments
Introduction		
1	<p>East Suffolk Council (ESC) noted that the following additional information has been provided by the Applicants at Deadline 11 and subsequent to Deadline 11 which is of relevance to the ESC's responsibilities:</p> <ul style="list-style-type: none"> • Applicants' Comments on East Suffolk Council's Deadline 10 Submissions – REP11-050 • Substations Design Principles Statement – AS-134 • Applicants' Responses to ExQ3 Volumes – REP11-072, REP11-085, REP11-086, REP11-088 to REP11-094 • Applicants' Responses to Hearing Action Points (Issue Specific Hearing 16 and Issue Specific Hearing 17) – REP11-082 • Deadline 11 Project Update – REP11-053 • Land Plans – REP11-003 • Work Plans – REP11-004 • Outline Code of Construction Practice – REP11-015 • Outline Construction Traffic Management Plan – REP11-017 • Outline Landscape and Ecological Management Strategy – AS-127 	<p>Noted. See ID3 to ID14 for the Applicants' comments.</p>

Applicants' Comments on ESC's Deadline 12 Submissions
5th July 2021



ID	ESC Comment	Applicants' Comments
	<ul style="list-style-type: none"> • Outline Port Construction Traffic Management Plan – REP11-024 • Outline Operational Drainage Management Plan – AS-125 • Outline Watercourse Crossing Method Statement – REP11-074 • Hundred River Ecology Survey Report – REP11-063 • Heritage Assessment GIS Addendum and Appendices – REP11-075 to REP11-080 • Landscape and Visual Impact GIS Addendum and Appendices – REP11-028 to REP11-044 • Applicants' Written Summary of Oral Case Issue Specific Hearing 16 – AS-136 • Applicants' Written Summary of Oral Case Issue Specific Hearing 17 – REP11-084 • Applicants' Comments on the ExA's Commentary on the dDCO – REP11-081 <p>ESC has reviewed the above documents and provided comments where relevant in the table on page 4. The comments provided relate to both East Anglia One North (EA1N) and East Anglia Two (EA2) projects.</p> <p>The comments contained within this document are from ESC. ESC continues to work closely with Suffolk County Council (SCC) on these projects but to avoid repetition, each Council will lead on specific topic areas as set out in the Councils' joint Local Impact Report (REP1-132).</p>	



ID	ESC Comment	Applicants' Comments
2	<p>ESC noted the further questions asked on 18 June 2021 by the Examining Authorities under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010. ESC has provided a response to these questions separately.</p>	<p>Noted. See Section 2.2 for the Applicants' comments.</p>
<p>Applicants' Responses to Hearings Action Points (ISH16 and ISH17) (REP11-082)</p>		
3	<p><i>Table 2 Applicants' Response to ISH17 Actions</i> <i>Number 5 – Impacts on noise and ecological receptors</i></p> <p>ESC welcomes the inclusion of a commitment within the third design principle in Table 5.1 in the Substations Design Principles Statement (AS-134), that the Operational Noise Design Report will include details of high frequency noise information.</p> <p>The Outline Landscape and Ecological Management Strategy (OLEMS, AS-127) has also been updated to identify that landscape planting at Work No.29 will be specifically designed and provided primarily as mitigation for foraging and commuting bats (paragraphs 185, 273). If therefore high frequency noise is identified within the operational noise from the substations, which is not or cannot be addressed by mitigation measures provided at the substations, appropriate mitigation has been secured within the OLEMS.</p>	<p>The Applicants welcome ESC's comments and thank ESC for its constructive engagement on this matter.</p>
4	<p><i>ID26 and ID35</i></p> <p>ESC notes that the Outline Code of Construction Practice (OCoCP, REP11-015) states: "<i>Prior to construction, the Applicant will identify the positioning and orientation of plant and equipment involved with the landfall construction in consideration of sensitive air quality</i></p>	<p>The Applicants provided an updated Outline Code of Construction Practice (document reference 8.1) at Deadline 12 clarifying that this commitment applies to both human and ecological receptors. The Applicants thank ESC for their engagement and support on closing out this matter.</p>



ID	ESC Comment	Applicants' Comments
	<p><i>receptors where practicable.</i>” ESC has interpreted this as including both natural habitat and human sensitive air quality receptors.</p> <p>This may also be addressed by the Applicants in response to ESC’s Deadline 11 submission (REP11-110) comments in relation to OCoCP paragraph 145.</p>	
5	<p><i>ID36</i></p> <p>ESC previously commented (REP11-110) in relation to paragraph 70 of the Outline Construction Traffic Management Plan: “It would be helpful for this paragraph to confirm that the highest emissions standard vehicles available will be used, and the majority of non-Euro VI HGVs will be Euro V, consistent with the information provided in Section 5.1.5 of the document.” The Applicants responded: “The Applicants will ensure paragraph 70 is amended to align with the text in Section 5.1.5 of the document” (REP11-082). However, the revised text does not reflect ESC’s request, which is important for controlling impacts in Stratford St Andrew. ESC therefore maintains this point. There may however be insufficient time within the examinations to address this issue and therefore ESC would like this noted by the Applicants and taken into consideration during the drafting of the final document.</p>	<p>The commitment agreed with ESC presented within Section 5.1.5 of the Outline Construction Traffic Management Plan (document reference 8.9) relates to the “Monitoring, Enforcement and Action Plan” and presents comprehensive details on the Heavy Goods Vehicle (HGV) emissions monitoring and reporting which is committed to by the Applicants, as discussed and agreed with ESC.</p> <p>At no point in discussions with ESC has a commitment been requested or made to ensure that the ‘highest emissions standard vehicles available’ will be used – this is not practicable as should vehicles higher than Euro VI become available, albeit in in low quantities, the Applicants would be unable to fulfil this commitment.</p> <p>Similarly, no commitment has been made that “the majority of non-Euro VI HGVs will be Euro V”. In reality, the majority of non-Euro VI HGVs are expected to be Euro V standard.</p> <p>The Applicants would clarify that the commitments agreed with ESC in Section 5.1.5 of the Outline Construction Traffic Management Plan (document reference 8.9) relate to 70% of HGVs being Euro VI standard and monitoring of the remaining vehicles to establish their Euro class.</p>
<p>Substations Design Principles Statement (AS-134)</p>		



ID	ESC Comment	Applicants' Comments
6	<p><i>Table 5.1, third design principle</i></p> <p>ESC welcomes the commitment that the Operational Noise Design Report will include details of high frequency noise information in 1/3 octave bands from 8kHz to 22kHz, where the information is available.</p>	<p>The Applicants welcome ESC's comments and thank ESC for its constructive engagement on this matter.</p>
7	<p><i>Table 5.1: Missing design principle</i></p> <p>ESC maintains its support the inclusion of an additional design principle which would encourage consideration of the potential for the design of the projects to adapt to the changing policy and technological environments. This was most recently set out in the Council's REP9-040 and REP9-041 submissions but ESC recognises that this is not a matter upon which agreement will be reached.</p>	<p>The Applicants maintain their position regarding the inappropriateness of inclusion of the additional principle within the Substations Design Principles Statement (AS-133). The Applicants refer back to their comments at ID43 in Section 2.1 of the Applicants' Comments on ESC's Deadline 9 Submission (REP10-007).</p>
<p>Outline Landscape Ecological Management Strategy (AS-127)</p>		
8	<p><i>Section 5.1.1.3 – Work No.29 and paragraph 273</i></p> <p>ESC welcomes the commitment to provide Work No.29 primarily in relation to mitigation for foraging and commuting bats.</p>	<p>The Applicants welcome ESC's comments and thank ESC for its constructive engagement on this matter.</p>
9	<p><i>Removal of paragraph 94</i></p> <p><i>Removal of Table 3.5 – Native Wet</i></p> <p><i>Paragraph 109 - Removal of Native wet woodland (W4)</i></p> <p><i>Woodland Species Mix (W4)</i></p> <p>From an ecological perspective, ESC understands that the creation of wet woodland within the proposed Sustainable Drainage</p>	<p>Noted. The Applicants would add that the removal of woodland planting within the footprint of the sustainable drainage systems (SuDS) basins was requested by Suffolk County Council (SCC) as the Lead Local Flood Authority (LLFA) during Issue Specific Hearing (ISH) 16.</p>



ID	ESC Comment	Applicants' Comments
	<p>Systems (SuDS) basins represents ecological enhancement rather than being necessary for mitigation or compensation purposes. Therefore, whilst the removal of this habitat type from the design of the site is disappointing and will result in a potentially lower amount of ecological enhancement being achieved, given the justification provided by the Applicants the Council can have no ecological objection to this change.</p>	
Outline Watercourse Crossing Method Statement (REP11-074)		
10	<p><i>Section 4.9 – Tree Protection</i> <i>Paragraph 66</i> Noted.</p>	Noted.
Applicants' Comments on East Suffolk Council's Deadline 10 Submissions (REP11-050)		
11	<p><i>ESC's Summary of Oral Case for ISH14 (REP8-147), Agenda Item 13 – Any other business relevant to the Agenda.</i> <i>ID33</i> ESC notes and welcomes this commitment.</p>	Noted.
Hundred River Ecology Survey Report (REP11-063)		
12	<p><i>Whole document</i> ESC notes the findings of this survey and has no further comment to make.</p>	Noted.
Heritage Assessment GIS Addendum (REP11-075)		



ID	ESC Comment	Applicants' Comments
13	<p><i>Whole document</i></p> <p>The Addendum provides a sufficiently detailed assessment of the potential impacts on the heritage assets, although ESC disagrees with some of the conclusions that are drawn.</p> <p>ESC agree that a Gas Insulated Switchgear (GIS) substation would have a different visual impact than the Air Insulated Switchgear (AIS) approach, as the substation would be taller and have a more solid mass, but on a smaller footprint. The top of the substation would be more visible above the tree line, even after 15 years of mitigation planting in place, however there would be a less widespread impact of infrastructure to the immediate south of Little Moor Farm. Notwithstanding, due to the scale of the EA1N and EA2 Substations and the presence of the cable sealing end compounds, the overall magnitudes of adverse impact on the listed buildings would be similar as with the AIS approach.</p> <p>ESC disagrees with the assessment that the mitigation planting would substantially lower the impact on the setting of Little Moor Farm and Woodside Farm. The visual impact of the GIS substation would still be notable, and as stated in previous responses, while the landscaping would provide a measure of screening, it would not be considered to lower the overall magnitudes of adverse impact.</p> <p>ESC considers that the magnitude of adverse impact of the GIS substation would be at a medium level Little Moor Farm, High House Farm, Woodside Farm, and the Church of St Mary, regardless of whether only EA1N, only EA2 or both substations were to be built, and regardless of the mitigation planting.</p>	<p>The Applicants welcome ESC's comments on the detail of the assessment and note that there is agreement on some assessment conclusions. The Applicants also understand that ESC and SCC (the Councils) consider that, in principle, woodland screening planting cannot fully mitigate effects on the setting of heritage assets. Notwithstanding its position, the Councils agree that the landscaping planting measures have been explored to their full potential in regard to minimising the effects of the permanent onshore infrastructure on the setting of the heritage assets (see statement LA-07.14 of the Statement of Common Ground (SoCG) with the Councils (REP12-070)).</p> <p>The Outline Landscape Mitigation Plan (OLMP) presented in Annex 2 of the Outline Landscape and Ecological Management Strategy (OLEMS) (AS-127) has been developed accounting for the historic landscape and the settings of heritage assets. North of the National Grid substation and onshore substations, the OLMP includes establishing larger woodland blocks akin to the pattern of existing blocks within the wider landscape. Between the substations and Friston Moor, the OLMP primarily seeks to reinstate the historic (19th century) field pattern to enhance the setting of High House Farm and Little Moor Farm.</p> <p>The Applicants accept that the OLMP does not further reduce the potential magnitude of impact on the setting of High House Farm from low adverse (minor significant effect) prior to mitigation. However, it is maintained that the implementation of the OLMP would reduce the effect on the setting of Little Moor Farm from a medium adverse magnitude, moderate significant effect to a low adverse magnitude, minor significant effect. The Applicants further stand by the assessment of effects on the setting of other heritage assets identified within the Heritage Assessment GIS Addendum (REP11-075), both with and without the application of mitigation planting as set out within the OLMP (Annex 2 of the OLEMS (AS-127)).</p>



ID	ESC Comment	Applicants' Comments
Landscape and Visual Impact Assessment GIS Addendum (REP11-028)		
14	<p><i>Whole document</i></p> <p>We note the content of the revised Landscape and Visual Impact Assessment (LVIA). We note the findings that the inclusion of GIS options in the LVIA makes no significant change to the conclusions of the original AIS based LVIA. Any suggestion that structures may have additional height over other options raises concerns in relation to potential problems in early screening plant establishment years given the previously recorded concerns with erratic rainfall in eastern Suffolk.</p>	<p>The Applicants note that it is structures within the GIS option that would have additional height over those within the Air Insulated Switchgear (AIS) option, the AIS option occupying a greater footprint and being considered the worst-case within the landscape and visual impact assessment undertaken in support of the Applications. The Applicants highlight updates made to the OLEMS (AS-127) regarding adaptive planting management (as requested by the Councils) which aims to de-risk the timely delivery of planting, achieve optimum levels of plant growth and provide greater confidence that effective screening from the tree planted areas will be achieved before the end of the adaptive management period (10 years).</p>



2.2 ESC's Responses to the Examining Authorities Rule 17 Questions of 18 June 2021 (REP12-083)

ExQ3 Ref	ExA Question	ESC's Comment	Applicants' Comments
Onshore Substation Siting and Design			
R17QF.7	<p>Landscape and Visual Impact</p> <p>The Outline Landscape and Ecological Management Strategy (OLEMS) version 6 dated 11 June 2021 [AS-127] contains an updated design for the proposed SuDS basins. The revised designs remove previous areas of wet woodland within the basins and appears to reorientate the basin for the proposed southern substations. In addition, text within the OLEMS has been amended to state that SuDS basins “may” be encompassed by bunds (as opposed to “will”)</p> <p>To the Applicants:</p> <p>a) How likely is it that bunding will be required for the SuDS basins?</p> <p>b) Para 138 of the OLEMS states that bunding for landscaping purposes is subject to detailed design and the availability of suitable material on site during construction. If suitable material is on site during construction, provide examples of what bunds may be constructed and to what purpose.</p>	<p>c) ESC has noted the proposed revised SuDS basin layout but does not consider that it will have any meaningful overall reduction of screening effects with the removal of the previously proposed wet woodland within the basins. However, it is possible that there may be some reduction in effectiveness of screening some views especially those on the public right of way that runs north-north-west along eastern boundary to Friston House, and most likely during the winter when leaves are off the trees, and also in the early years of screen planting establishment. This conclusion is based on an assumption that the Applicants achieve the predicted new planting growth rates that have been relied on throughout the examination process.</p> <p>d) It is ESC's understanding that the creation of wet woodland within the proposed SuDS basins represented an ecological enhancement rather than being necessary for mitigation or compensation purposes. Therefore, the removal of this habitat type from the design of the site will result in a potentially lower amount of</p>	<p>c) The Applicants welcome ESC's comments on the potential effect of the revised SuDS basin designs on visual amenity.</p> <p>The Applicants note that the wet woodland within the SuDS basins was proposed for reasons of ecological enhancement and not for screening purposes. The Applicants highlight updates made to the OLEMS (AS-127) regarding adaptive planting management (as requested by the Councils) which aims to de-risk the timely delivery of planting, achieve optimum levels of plant growth and provide greater confidence that effective screening from the tree planted areas will be achieved before the end of the adaptive management period (10 years).</p> <p>d) Noted. The Applicants would add that the removal of woodland planting within the footprint of the SuDS basins was requested by SCC as the LLFA during ISH16 and have no further comments on this matter. The OLEMS (AS-127) commits the Applicants to sowing the footprint of the operational SuDS basins with grass seed mix comprising species tolerant of both wet and dry conditions. Opportunities therefore remain to sow water tolerant species rich grassland within the operational SuDS</p>



ExQ3 Ref	ExA Question	ESC's Comment	Applicants' Comments
	<p>To SCC, ESC, Historic England and other Interested Parties:</p> <p>c) Provide any further submissions you may wish to make on the landscape and visual impact of the latest iteration of the proposed SuDS basins.</p> <p>d) Does the removal of the previously proposed wet woodland have an adverse effect on the ecological aims of the proposed developments?</p> <p>e) Does the removal of the previously proposed wet woodland have an adverse effect on the role of the OLEMS proposals as landscape or historic environment mitigation?</p>	<p>ecological enhancement being achieved by the developments as there will be a less varied suite of habitats created around the substations. The justification provided by the Applicants as to why wet woodland cannot be created in this location is noted and given the constraints stated, ESC understands why the design change has been proposed.</p> <p>e) As noted in ESC's response to c), the Council does not consider that the revised SuDS basin layout will have any meaningful overall reduction of screening effects with the removal of the previously proposed wet woodland within the basins. However as stated above, it is possible that there may be some reduction in effectiveness of screening some views from the public right of way along the eastern boundary during the winter months and early years of planting establishment.</p> <p>On this basis, there is potential scope for a reduced role in the effect of the Outline Landscape and Ecological Management Strategy (OLEMS) in mitigating potential landscape or historic environment impacts, but the Council considers that this is minor, seasonal, and temporal albeit dependant on the rate of early years plant</p>	<p>basins, which will provide further benefits for biodiversity.</p> <p>e) See comments at c) above.</p> <p>The Applicants are supportive of ESC being the discharging authority for all requirements that affect the layout of the area around the substation to ensure a co-ordinated approach to the final detailed designs.</p>



ExQ3 Ref	ExA Question	ESC's Comment	Applicants' Comments
		<p>establishment. ESC therefore considers that there would be no change to the overall impact on the setting of the listed buildings.</p> <p>The issues raised in this document highlight the need for ESC to be the discharging authority for all requirements that affect the layout of the area around the substation to ensure a co-ordinated approach to the final detailed designs.</p>	
Construction			
R17QF.10	<p>Landscape and Visual Impact: Construction Drainage Management</p> <p>The Outline Code of Construction Practice [REP11-015] provides an example construction surface water drainage scheme at the Substations Location (Appendix 2, Figure 3). This is described in the text as a worst-case indicative general arrangement (para 176).</p> <ul style="list-style-type: none"> Provide any submissions you may wish to make on any impacts of this proposed construction surface water drainage scheme on matters of landscape, visual impact and the setting of heritage assets. 	<p>In relation to other construction activity, ESC does not consider that these temporary construction drainage basins will have any meaningful impact on the overall landscape and visual impacts arising during the construction phase. The only caveat to this would be if the substations were not built simultaneously but sequentially and any screen planting that was planted after a first phase was later disrupted or removed to achieve later phase construction including temporary drainage provision. In such circumstances the mitigation benefit of initial new planting would be potentially severely set back, thus having an ongoing or indeed returning</p>	<p>The Applicants agree with ESC's summary that there is unlikely to be a meaningful impact on the overall landscape and visual impacts arising during the construction phase as a result of the temporary construction SuDS basins.</p> <p>Landscape planting will be designed strategically, to ensure that in a sequential construction scenario, the second project will not materially affect any planting undertaken as part of the first project. It is noted that due to the strategic landscaping approach adopted by the Applicants, planting undertaken for the first project will also in effect, provide earlier screening benefits to the second project than would otherwise have been realised.</p>



ExQ3 Ref	ExA Question	ESC's Comment	Applicants' Comments
		<p>adverse impact on landscape character and visual amenity.</p> <p>The Outline Code of Construction Practice does not assess the potential impacts on the setting of the heritage assets.</p> <p>Notwithstanding this, as the temporary construction drainage basins would not have a meaningful impact on the structural landscape mitigation planting, ESC considers there would not be a notable impact on the settings of the heritage assets.</p>	