

East Anglia TWO Offshore Windfarm

Appendix 21.1 Land Use Consultation Responses

Environmental Statement Volume 3

Applicant: East Anglia TWO Limited
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Appendix 21.1 is supported by the tables listed below.

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Glossary of Acronyms

ALC	Agricultural Land Classification
CoCP	Code of Construction Practice
CIA	Cumulative Impact Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
ESS	Environmental Stewardship Scheme
NSIP	Nationally Significant Infrastructure Project
OCoCP	Outline Code of Construction Practice
OPRoWS	Outline Public Rights of Way Strategy
PRoW	Public Right of Way
SCC	Suffolk County Council
SCDC	Suffolk Coastal District Council
SMP	Soils Management Plan
WDC	Waveney District Council

Glossary of Terminology

Applicant	East Anglia TWO Limited.
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
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 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.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
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 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 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 Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
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 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 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 project.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.

21.1 Land Use Consultation Responses

21.1 Introduction

1. This appendix to **Chapter 21 Land Use** covers those statutory consultation responses that have been received as a response to the Scoping Report (2017) and the Preliminary Environmental Information Report (PEIR) (2019).
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A21.1.1**.
3. As Section 42 consultation for the proposed East Anglia TWO project was conducted in parallel with the proposed East Anglia ONE North project, where appropriate, stakeholder comments which were specific to East Anglia ONE North, but may be of relevance East Anglia TWO, have also been included in the consultation responses for East Anglia TWO.

Table A21.1.1 Consultation Responses Related to *Chapter 21 Land Use*

Consultee	Date/ Document	Comment	Response / where addressed in the ES
<p>The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR.</p>			
Aldringham-cum-Thorpe Parish Council	07/12/2017 Scoping Response	Any land taken for the laying of the onshore cables should also be restricted to agricultural land. This land should be purchased by SPR and following the works, gifted to the community for rewilding, giving long term benefit, and an overall improvement to the [Area of Outstanding Natural Beauty] AONB, going some way to mitigate the presence of the substations within our beautiful and precious landscape.	Noted. The Applicant is working closely with local communities.
Suffolk County Council and Suffolk Coastal District Council	08/12/2017 Scoping Response	It is disingenuous to suggest that land users 'may potentially experience disruption' as is stated in the Scoping Report. Based on the current EA ONE project, it is clear that there will be an impact on users of the [Public Rights of Way] PRoW and access network and this impact needs to be considered from the first stage to the last stage in the installation process. This includes the physical disruption to the network of activities such as the preparation of the working width - topsoil stripping, as well as the potential for obstacles such as new fencing, gates, fencing of the	PRoW are covered as a baseline to the existing environment in section 21.5.8 of this chapter. Reference should be made to Chapter 30 Socio-Economics, Recreation and Tourism where potential impacts to PRoW, access network and users of PRoW are considered further. An Outline Public Rights of Way Strategy (OPRoWS) (document reference 8.4) has been submitted with this DCO application, and secured under the requirements of the draft DCO.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		corridor and unnecessary or unsuitable alternative routes.	
Suffolk County Council and Suffolk Coastal District Council	08/12/2017 Scoping Response	It is unacceptable to install unnecessary obstacles such as fences and gates across the network. These have now been kept to a bare minimum on EA One (2 only) and this message needs to be clear for East Anglia Two.	Noted, access obstacles will be kept to a minimum and fences/gates will only be installed where required for security and safety purposes. Refer to Chapter 6 Project Description for more information
Suffolk County Council and Suffolk Coastal District Council	08/12/2017 Scoping Response	It is unacceptable for any PRoW to be permanently closed as a result of this project. This area has a well-used and coherent access network visited by local residents and visitors alike and this must not be put at risk. In addition, the impact on the amenity value of this network must be assessed with respect to the positioning and visual impact of the substations.	As a result of the location of the onshore substation, one PRoW will potentially be permanently diverted however there will be no permanent closures to any PRoW within the onshore development area. Reference should be made to Chapter 30 Socio-Economics, Recreation and Tourism where potential impacts to PRoW are considered in greater detail.
Natural England	08/12/2017 Scoping Response	Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the National Policy Planning Framework (NPPF). We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as	The site selection process has considered impacts on Environmental Stewardship Schemes (ESS) (section 21.5.5 of this chapter) and agricultural land of high grade (section 21.5.3 of this chapter). Also refer to section 21.5.4 of this chapter for specific referral to soil preservation.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		a natural resource in line with paragraph 109 of the NPPF.	
Anglian Water	08/12/2017 Scoping Response	Reference is made to the crossing of existing utilities including assets owned by Anglian Water. There are existing Anglian Water sewers located within the boundary of the site which potentially be affected. We would expect any requests for alteration or removal of foul sewers to be conducted in accordance with the Water Industry Act 1991. The extent to which existing sewers would be affected will need to be defined with the assistance of Anglian Water.	All utilities owners will be consulted with and appropriate crossing agreements will be reached post-consent. Utilities are considered further in sections 21.5 and 21.5.9 of this chapter .
Anglian Water	08/12/2017 Scoping Response	It is suggested that the PEI should include reference to the sewage treatment as well as the foul sewerage network and water mains.	See section 21.5.9 of this chapter for utilities consideration.
EPS Utilities	23/11.2017 Scoping Response	As your plans for the proposed work develop you are required to keep ES Pipelines Ltd regularly updated about the extent and nature of your proposed works in order for us to fully establish whether any additional precautionary or diversionary works are necessary to protect our gas and electricity networks. Arrangements can be set in place so that one of our representatives can meet on site (date to be agreed) and we will be happy to discuss the impact of your proposals on the gas and	All utilities owners will be consulted with and appropriate crossing agreements will be reached. Utilities are considered further in sections 21.5 and 21.5.9 of this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		electricity networks once we have received the details.	
Forestry Commission	16/11/2017 Scoping Response	We have examined the scoping document and note the reference to the national grid's Horlock Rules which indicates a serious attempt to avoid the worse impacts on the environment however we believe these may be a little out of date given that the assessment of Ancient woodland within the scoping document refers to it only within the paragraph on 'areas of local amenity value'. We do not believe this to be an adequate description, Ancient Woodland is of national significance and is an irreplaceable habitat as described in paragraph 118 NPPF therefore we suggest that it needs to be given a much stronger consideration and value than is currently indicated by the wording. It is not clear how impacts on Ancient woodlands are to be assessed and mitigated, whereas heritage sites have specific passages associated with this.	Noted. Ancient woodland should be conserved and enhanced under the NPPF and therefore considered of high importance by the proposed East Anglia TWO project. Refer to Chapter 22 Onshore Ecology for a detailed baseline description of all habitats and potential impacts upon them.
The Planning Inspectorate	20/12/2017 Scoping Response	The PEI should set out the time of year and the conditions of the site walkover study including any limitations.	For details of the site walkover, refer to Chapter 22 Onshore Ecology Appendix 22.3 .
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report identifies that a soil and drainage management strategy will be developed if required, depending on	An Outline Code of Construction Practice (OCoCP) (document reference 8.4) has been secured under

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		the results of pre-construction surveys for the cable corridor restoration. The PEI should address how soils and drainage will be managed and assess any impacts. Any mitigation required should be explained in the PEI and appropriately secured.	the requirements of the draft DCO and has been submitted with the draft DCO for consultation. The OCoCP includes soil and drainage measures to be used during construction where appropriate. See sections 21.6.1.3 and 21.6.1.4 of this chapter for further information. Permanent drainage requirements for the substation are outlined in Chapter 6 Project Description .
The following comments were made in response to the PEIR and were taken into account in the production of this ES.			
Natural England	26/03/2019 Section 42 Consultation Response	Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. SPR should consider the following issues as part of the Environmental Statement: 1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved. This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification	The extent to which soil resource will be impacted upon is detailed within section 21.6.1.4 of this chapter. This section includes details of a range of embedded mitigation measures which may be employed to reduce the effect of the construction activities on the soil resource. The data used to inform this assessment is detailed within section 21.4.2 of this chapter. This includes the use of the ALC data set.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p>(ALC) information see www.magic.gov.uk Natural England Technical Information Note 049 - Agricultural Land Classification: protecting the best and most versatile agricultural land also contains useful background information.</p> <p>2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres.</p> <p>3. The Environmental Statement should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.</p>	
Natural England	26/03/2019 Section 42 Consultation Response	Consideration should be given to those areas in stewardship agreements and discussion held with the Rural Payments Agency and the agreement holder at the earliest opportunity.	Impacts to Environmental Stewardship Schemes (ESS) are given in section 21.6.1.2 of this chapter. The Applicant will consult with affected landowners to agree the necessary compensations.
Natural England	26/03/2019	We also welcome the intention to produce a Soil Management Plan to	Noted.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
	Section 42 Consultation Response	include construction method statements for soil handling.	
Suffolk County Council/Suffolk Coastal District Council	27/03/2019 Section 42 Consultation Response	We register concerns relating to loss and sterilisation of good quality agricultural land at Friston in order to accommodate the substations for the projects.	Impacts on agricultural land taken out of existing use are detailed within section 21.6.1.1 of this chapter. This section, and section 21.5 of this chapter, provides a comparison of the agricultural land taken by the onshore substation and National Grid infrastructure in relation to Suffolk County as a whole.
Suffolk County Council/Suffolk Coastal District Council	27/03/2019 Section 42 Consultation Response	The cable corridor for the project predominantly crosses agricultural land. Agricultural land is vulnerable to structural damage, erosion, compaction and the introduction of notifiable weeds. The works may significantly degrade soil quality and future agricultural productivity. In particular soil stripping, the formation and long-term presence of stockpiled top soil and the creation of a hard-packed haul road is likely to impact arable land. Mitigation measures in the form of a Soils Management Plan (SMP) should be adopted to ensure the land is properly reinstated, uneven compaction is avoided, and top soil degradation is minimised, so as to allow the agricultural land to be suitably reused. These comments would apply equally to the substation area, although the land may not be able to be utilised	The extent to which soil resource will be impacted upon is detailed within section 21.6.1.4 of this chapter. This section includes details of a range of embedded mitigation measures which may be employed to reduce the effect of the construction activities on the soil resource. This includes the production of a SMP, which is secured by the requirements of the draft DCO. As part of the decommissioning phase of the proposed East Anglia TWO project, land reinstatement will be undertaken throughout the onshore development area where possible.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		again for agricultural production significant mitigation planting is proposed in the locality.	
Suffolk County Council/Suffolk Coastal District Council	27/03/2019 Section 42 Consultation Response	The land use within the onshore development area is predominantly agricultural, with the majority comprising arable land with a small amount of grazing pastures. Within the development area there are also some non-agricultural areas which comprise woodland and minor waterbodies etc. The Agricultural Land Classification is used to classify agricultural land in England and Wales according to the quality and versatility of the soil, Grade 1 representing the best quality through to Grade 5 which is of the poorest quality. Although the onshore development area covers a combination of Grade 2, Grade 3 and Grade 4 agricultural land, the onshore substations sit almost entirely on Grade 2 with the National Grid substation sitting across Grade 2 and 3. Although only a small percentage of land within the onshore development area falls within Grade 2, the land which does fall within this classification will be utilised to accommodate the permanent substation infrastructure and therefore comprises the only areas which would not be reinstated after construction. The necessity for extensive planting by	Impacts on agricultural land taken out of existing use are detailed within section 21.6.1.1 of this chapter. This section, and section 21.5 of this chapter, provides a comparison of the agricultural land taken by the onshore substation and National Grid infrastructure in relation to Suffolk County as a whole. The onshore development area has been refined to avoid interaction with the best agricultural land where possible. Chapter 2 Need for the Project presents the policy support for the proposed East Anglia TWO Project.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p>virtue of the site selection will also involve the utilisation of greater areas of Grade 2 land. The Councils are concerned about the loss and sterilisation of good quality agricultural land in order to accommodate the substations for the projects at Friston. NPS EN-1 states that applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grade 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations.</p>	