



**SCOTTISHPOWER  
RENEWABLES**

# **East Anglia TWO Offshore Windfarm**

## **Appendix 29.1** LVIA Consultation Responses

### **Environmental Statement Volume 3**

Applicant: East Anglia TWO Limited  
Document Reference: 6.3.29.1  
SPR Reference: EA2-DWF-ENV-REP-IBR-000921\_001 Rev 01  
Pursuant to APFP Regulation: 5(2)(a)

Author: Royal HaskoningDHV  
Date: October 2019  
Revision: Version 1

Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	08/10/2019	Paolo Pizzolla	Julia Bolton	Helen Walker

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

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**Appendix 29.1** is supported by the tables listed below.

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<b>Table A29</b>	LVIA Consultation Responses

## Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
AIS	Air Insulated Switchgear
CA	Conservation Area
CIA	Cumulative Impact Assessment
CCS	Construction Consolidation Sites
DAS	Design and Access Statement
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ETG	Expert Topic Group
ES	Environmental Statement
GIS	Geographical Information System
GIS (building)	Gas Insulated Switchgear (building)
GLVIA	Guidelines for Landscape and Visual Impact Assessment
HDD	Horizontal Directional Drilling
HE	Historic England
HVAC	High Voltage Alternating Current
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LCU	Landscape Character Units
LI	Landscape Institute
LVIA	Landscape and Visual Impact Assessment
NCA	National Character Areas
NP	National Park
NPS	National Policy Statement
NE	Natural England
OCOCP	Outline Code of Construction Practice
OLEMS	Outline Landscape and Ecology Management Strategy
OS	Ordnance Survey
PEIR	Preliminary Environmental Information Report
PRoW	Public Rights of Way
RPG	Registered Park and Garden
SNH	Scottish Natural Heritage
SoS	Secretary of State
SuDS	Sustainable Drainage System
WCA	Worst Case Assumption

## 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.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to the EIA and the information required to support HRA.
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.
SuDS – Sustainable Drainage System	Approaches to manage surface water that take account of water quantity (flooding), water quality (pollution) biodiversity (wildlife and plants) and amenity
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.



## 29.1 Consultation Responses

### 29.1 Introduction

1. This appendix to **Chapter 29 Landscape and Visual Impact Assessment** covers those statutory consultation responses that have been received as a response to the Scoping Report (2017), the Preliminary Environmental Information Report (PEIR) (2018) and Expert Topic Group (ETG) Meetings.
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A29.1**.
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 A29.1 Consultation Responses Related to *Chapter 29 Landscape and Visual Impact Assessment*

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>			
The Planning Inspectorate	20.12.2017 Scoping Response	The Inspectorate agrees that following remediation works the underground infrastructure at the landfall is unlikely to result in significant effects and this matter can be scoped out of the assessment.	<b>Section 29.1</b> of this chapter.
The Planning Inspectorate	20.12.2017 Scoping Response	The Inspectorate agrees that following remediation works the underground infrastructure on the onshore cable route is unlikely to result in significant effects and this matter can be scoped out of the assessment.	<b>Section 29.1</b> of this chapter
The Planning Inspectorate	20.12.2017 Scoping Response	Cumulative landscape and visual impacts of landfall options and onshore cable route during all phases. The Inspectorate does not agree that this can be scoped out. The Inspectorate is aware of potential further developments such as Sizewell New Nuclear Power Station, and furthermore, the landfall is not yet finalised.	Cumulative landscape and visual effects assessed in <b>Appendix 29.5</b> and summarised in <b>section 29.7</b> <i>Error! Reference source not found.</i> of this chapter.
The Planning Inspectorate	20.12.2017 Scoping Response	Cumulative landscape and visual impacts of the onshore substation and National Grid infrastructure (within 3km buffer LVIA study area) during construction and decommissioning. The Inspectorate does not agree that this can be scoped out. As the location of such infrastructure including the substation is not yet known potential significant effects as a result of cumulative development cannot be predicted.	Cumulative landscape and visual effects assessed in <b>Appendix 29.5</b> and summarised in <b>section 29.7</b> <i>Error! Reference source not found.</i> of this chapter.  Cumulative landscape and visual effects have included an assessment of potential impacts within 3km of the onshore development area.
The Planning Inspectorate	20.12.2017 Scoping Response	Landscape and visual and cumulative impacts of the onshore infrastructure outwith 3km buffer LVIA study area during all phases. The Inspectorate therefore does not agree that this can be scoped	LVIA study area defined as 3km buffer from the onshore infrastructure as shown in

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		out. As the location of such infrastructure including the substation is not yet known potential significant effects as a result of cumulative development cannot be predicted.	<b>Figure 29.1</b> as included in LVIA Method Statement and ETG consultations.
The Planning Inspectorate	20.12.2017 Scoping Response	The ES should ensure that all components of the Proposed Development are addressed by the assessment, for example, construction compounds. All works, temporary and permanent, should be clearly included in the assessment.	Onshore infrastructure including all works, temporary and permanent, including construction compounds for onshore substation, onshore cable route and landfall are assessed in full in <b>Appendix 29.3-29.4</b> and summarised in <b>section 29.6</b> of this chapter.
The Planning Inspectorate	20.12.2017 Scoping Response	The ES should explain the ZTV model used and the times of year that any surveys used to inform the assessment have been undertaken and the prevalent weather conditions.	<b>Appendix 29.2</b> provides a detailed description of the assessment methodology which is summarised in <b>section 29.4.6</b> of this chapter.
The Planning Inspectorate	20.12.2017 Scoping Response	The viewpoints to be used for the assessment should be agreed with the relevant Local Planning Authority and NE in relation to the AONB.	Agreed viewpoints for the onshore LVIA listed in <b>Table 29.6</b> of this chapter.
The Planning Inspectorate	20.12.2017 Scoping Response	The Scoping Report sets out that the methodology will be in line with the GLVIA but no further information is included. The Inspectorate requires the ES to include photomontages at relevant viewpoints to be agreed with the Local Planning Authority	Viewpoints have been agreed with the ETG for the onshore LVIA as listed in <b>Table 29.6</b> of this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017 Scoping Response	The Environmental Statement should include details of the approach to visualisations.	Approach to visualisation production described in <b>Appendix 29.2</b> .
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017 Scoping Response	Definitions of duration of landscape and visual effects should be provided.	<b>Appendix 29.2</b> and <b>section 29.4.3.5</b> of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017 Scoping Response	The following are essential: A realistic worst-case scenario to be used; A clear definition of the range of susceptibility of landscape types. Thresholds of significance need to be agreed as part of the methodology prior to submission of the ES.	Realistic worst-case scenario described <b>section 29.3.2</b> of this chapter. Definition of susceptibility described <b>Appendix 29.2</b> . Thresholds of significance described in <b>Appendix 29.2</b> .
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017 Scoping Response	A full understanding and assessment of the proposed development on the Suffolk Coast and Heaths AONB Special Qualities Document is necessary to meet the requirements of EN3 (2.6.203), where assessment is required of people's perception and interaction with the seascape. The SLVIA will need to systematically assess the impacts of the proposal on the character and special qualities of the AONB.	Effects on special qualities of the AONB assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter. The approach of this chapter to the assessment of the effects on landscape character of the AONB, has been to base the assessment on the more tangible and clearly landscape focused 'natural beauty' indicators, identified in Section 2.0 of the 'Special Qualities Report' (SCDC 2016), as indicators of the landscape qualities of the AONB.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
			<p>The assessment, utilises the table of natural beauty indicators from the AONB special qualities report and assess, for each of the onshore substation, onshore cable route and landfall:</p> <ul style="list-style-type: none"> <li>• The magnitude of change to the AONB special qualities indicator resulting from proposed East Anglia TWO project onshore infrastructure (high / medium / low/ negligible / none); and</li> <li>• The significance of effect on the AONB special qualities indicator resulting from proposed East Anglia TWO project onshore infrastructure (significant / not significant). Determined by combining the sensitivity of the AONB and magnitude of change to the AONB special qualities indicator.</li> </ul>
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017 Scoping Response	The ES needs to assess the potential impact of the proposed development on the setting of the AONB as well as the AONB itself, as explained further in Position Statement: Setting of the Suffolk Coast & Heaths AONB.	Effects on setting of the AONB assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> <i>Error! Reference source not found.</i> of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017 Scoping Response	Full assessment of combined onshore and offshore effects is critical where combined effects are experienced, either simultaneously or in near immediate sequence. Combined landscape and visual effects between offshore and onshore project components are likely to occur and the agreed methodology should allow evaluation of these combined effects.	Combined onshore and offshore effects are assessed in <b>section 28.11</b> of <b>Chapter 28 Seascape, Landscape and Visual Impact Assessment</b> .

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017  Scoping Response	Future projects include the Nautilus interconnector. The applicant should not exclude the project from the CIA at this stage.	Nautilus interconnector excluded from cumulative LVIA. See <b>section 28.11</b> of <b>Chapter 28 Seascape, Landscape and Visual Impact Assessment</b> .  The cumulative impact assessment has considered projects which were sufficiently implemented during baseline survey. This methodology for the EIA is in line with Advice Note 17 (the Planning Inspectorate 2015).
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02.12.2017  Scoping Response	The agreed approach to viewpoint selection and timing of baseline photography is an attempt by all parties to properly evaluate the impacts.	Viewpoint assessment from agreed viewpoints undertaken in <b>Appendix 29.4</b> and summarised in <b>section 29.6</b> of this chapter.
Suffolk County Council / Suffolk Coastal District Council	17.07.2018	We accept the submitted (onshore) viewpoint locations, but with following requested additions:  Footpath T junction at GR425611  Footpath T junction at GR426606  Footpath road junction at GR421627  Footpath T junction at GR398625  Sloe Lane at GR399600  We also considered that the sealing in compound should be considered in the viewpoints and represented in the photo montages and wireframes. We further considered that the woodland belt crossing at Aldringham Court should also be included with a westward viewpoint from the B1122 and an eastward viewpoint from the footpath at GR444604.	13 viewpoints agreed with the ETG for the onshore LVIA as listed in <b>Table 29.6</b> of this chapter and shown in <b>Figure 29.4</b> .  Additional viewpoints requested by SCC/ESC are not included as representative viewpoints in the LVIA but have been reviewed further in this chapter and have been scoped out of the detailed assessment. Illustrative baseline panoramas from these viewpoints are shown in <b>Figure 29.27 – 29.32</b> .

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Norfolk County Council	November 2017 Scoping Response	For both offshore and onshore development, the EIA/PEIR will need to provide: an assessment of the impact of the development on the landscape and seascape character.	Impacts on landscape character assessed in <b>Appendix 29.3</b> summarised in <b>section 29.6</b> of this chapter.
Norfolk County Council	November 2017 Scoping Response	An assessment of the visual impact which should include a ZTV and photomontages illustrating the impact of the development.	Visual effects assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter. ZTVs provided in <b>Figures 29.7 – 29.9</b> . Photomontages provided in <b>Figures 29.13 – 29.26</b> .
Norfolk County Council	November 2017 Scoping Response	An assessment of the impact of the development on the heritage landscape.	Effects of the proposed development on cultural heritage are assessed in <b>Chapter 24 Archaeology and Cultural Heritage</b> and <i>inter-relationships of LVIA and heritage</i> are described in <b>section 29.8</b> of this chapter.
Natural England	08.12.2017 Scoping Response	Welcomes further information pertaining to the specific survey methodologies to be adopted for assessment of impacts and for a preliminary assessment of key potential impacts associated with the development.	LVIA Methodology described in <b>Appendix 29.2</b> . Assessments of landscape and visual effects provided in <b>Appendix 29.3, 29.4 and 29.5</b> and summarised in <b>section 29.6</b> of this chapter.
Natural England	08.12.2017 Scoping Response	The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development and reference to the relevant National Character Areas.	Effects on landscape character assessed in <b>Appendix 29.3</b> , summarised in <b>section 29.6</b> of this chapter and shown in <b>Figure 29.2</b> .
Natural England	08.12.2017 Scoping Response	The EIA should include assessments of visual effects on the surrounding area.	Visual effects assessed in <b>Appendix 29.4</b> and summarised in <b>section 29.6</b> of this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Natural England	08.12.2017 Scoping Response	Natural England supports the use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment (GLVIA 3).	<b>Appendix 29.2.</b>
Natural England	08.12.2017 Scoping Response	The LVIA should assess the impacts of the proposed East Anglia TWO offshore windfarm on the special characteristics of the Suffolk Coast and Heaths AONB and the Suffolk Heritage Coast. Consideration should be given to the direct and indirect effect upon this designated landscape, in particular the effect upon its purpose for designation.	<b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.
Expert Topic Group	27.04.2018 LVIA / SLVIA ETG Meeting	The format of the Onshore LVIA and Offshore SLVIA should be considered, with the potential for merging of the two topics to address the overlap of onshore and offshore landscape and visual effects.	Offshore SLVIA is contained in <b>Chapter 28 Seascape, Landscape and Visual Impact Assessment</b> and <b>Appendices 28.2 – 28.7</b> . Onshore LVIA is contained in this chapter and <b>Appendix 29.3 – 29.5</b> . Inter-related effects of both offshore and onshore elements are assessed in <b>section 28.8 of Chapter 28 Seascape, Landscape and Visual Impact Assessment</b> .
Expert Topic Group	27.04.2018 LVIA / SLVIA ETG Meeting	Consultees requested clear documentation that explains what is to be assessed under each 'scenario' and for each application (EA1N and EA2).	Scenarios for the impact assessment contained in this LVIA are explained in <b>section 29.1.1</b> of this chapter.
Expert Topic Group	27.04.2018 LVIA / SLVIA ETG Meeting	Confirmed list of projects for cumulative assessment to be circulated to all ETG stakeholders. Requested that Greater Gabbard and Galloper wind farms are included in the SLVIA baseline. The stage two SZC consultation should inform the basis for the development of a worst-case scenario to deal with these cumulative impacts of the construction and operation of Sizewell C.	Agreed list of cumulative projects for assessment in the LVIA in <b>Table 29.13</b> of this chapter.



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Expert Topic Group	27.04.2018 LVIA / SLVIA ETG Meeting	Agreed that definitions of duration (short, medium & long-term) should match those agreed in East Anglia ONE and East Anglia THREE projects.	Definitions of duration match those agreed for East Anglia THREE project as set out in <b>section 29.4.3.5</b> of this chapter and <b>Appendix 29.2</b> .
<b>The following comments were made in response to the PEIR and were taken into account in the production of this ES.</b>			
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	However, the AONB Partnership notes the ScottishPower Renewables Landscape and Visual Impact Assessment acknowledgement that the residents of Friston, outside the AONB, would receive significant permanent adverse impacts from the development of substations at this location.	Visual effects on residents of Friston assessed in <b>Appendix 29.4</b> and summarised in <b>section 29.6</b> of this chapter.
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership acknowledge the benefit to the AONB landscape of undergrounding the necessary cables through the nationally designated area during the operational phase, but have concerns about impacts during the construction phase.	The acknowledged benefit of undergrounding the necessary cables through the AONB is welcomed. Landscape and visual effects of the construction of the onshore infrastructure on the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	However, The AONB Partnership, have concerns about the negative impact on the features of AONB designation, for example tranquillity, landscape quality, scenic quality, relative wildness, natural heritage features and cultural heritage during the onshore construction phase.	Effects of the construction of the onshore infrastructure on AONB special qualities are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.  Effects of the construction of the onshore infrastructure on natural heritage are assessed in <b>Chapter 22 Onshore Ecology</b> ; and effects of the construction of the onshore infrastructure on cultural heritage are assessed in <b>Chapter 24 Archaeology and Cultural Heritage</b> .

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Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	This concern is particularly acute relating to the character of the AONB, its long distance and panoramic views, the introduction of human activity at an industrial scale, the reduction in features associated with tranquillity and seascape character.	Effects of the onshore infrastructure on landscape character of the AONB are assessed in <b>Appendix 29.3</b> . Visual effects are assessed in <b>Appendix 29.4</b> . Both are summarised in <b>section 29.6</b> of this chapter.
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership considers that to conform to EN1 that the proposed developments should not significantly negatively impact nationally designated landscape.	<b>Table 29.4</b> of this chapter. The Applicant considers that the proposed East Anglia TWO project has been designed carefully, taking account of the potential effects on the AONB landscape and in order to minimise harm to the AONB and providing reasonable mitigation.
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership considers that to conform to EN3 that the proposed developments should not have significantly negatively impact nationally designated landscape. Where there are significant adverse impacts these should be outweighed by environmental, social and economic benefits	<b>Table 29.4</b> of this chapter. The Applicant considers that the proposed East Anglia TWO project demonstrates good design in respect of landscape and visual amenity, and in the design of the proposed East Anglia TWO project to mitigate effects on the AONB. Refer to <b>Chapter 2 Need for The Project</b> for further detail on environmental, social and economic benefits arising from the proposed East Anglia TWO project.
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership considers that to conform to EN5 that the proposed developments should pay regard to the economic, social and environmental indicators of the AONB. Given the proposed undergrounding of cables it is satisfied that SPR have acknowledged the AONB in respect of connections between offshore infrastructure and proposed substation subject to an appropriate scheme of works to deliver this element.	The acknowledged mitigation of effects on the AONB through undergrounding of the necessary cables is welcomed.

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Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	<p>The AONB Partnership consider that the proposals need to be determined against the relevant National Policy Statements and Legislation. The AONB Partnership notes that:</p> <p><i>Section 85 of the Countryside and Rights of Way Act (2000) that states:</i>  <i>General duty of public bodies etc.</i>  <i>(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.</i>  <i>(2) The following are relevant authorities for the purposes of this section—</i>  <i>(a) any Minister of the Crown,</i>  <i>(b) any public body,</i>  <i>(c) any statutory undertaker,</i>  <i>(d) any person holding public office.</i></p> <p>The AONB Partnership considers that ScottishPower Renewables as a statutory undertaker is required to pay due regard to the purpose of the AONB when undertaking its operations</p>	<p>The Applicant considers that the proposed East Anglia TWO project has paid due regard to the statutory purpose of the AONB, in so far as the proposed East Anglia TWO project demonstrates good design and includes recognised mitigation, in particular through the design of the underground cables through the AONB; and the siting of the substation and National Grid infrastructure outside the AONB. Effects on the special qualities of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.</p> <p>Outline management plans, across a number of environmental topics, have been submitted with the DCO application. These outline management plans contain the key principles that provide the framework to discharge relevant DCO requirements to commence and implement construction of the proposed East Anglia TWO project (see <b>Appendix 6.2</b>).</p> <p>The Applicant recognises that production of outline management plans is an important element in the management and verification of the impacts of the proposed East Anglia TWO project (see <b>section 6.11</b> in <b>Chapter 6 Project Description</b>).</p>
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	<p><i>The statutory Suffolk Coast &amp; Heaths AONB Management Plan 2018-23 outlines within its 25 year vision for the area that:</i>  <i>Nationally Significant Infrastructure Projects such as energy production and its associated infrastructure should seek to avoid damage to the natural beauty</i></p>	<p>The applicant consider that the proposed East Anglia TWO project meets the aims of the statutory AONB management plan, in so far as the proposed East Anglia TWO project seeks to avoid damage to the natural beauty of the AONB through good siting and</p>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p><i>of the AONB and where this cannot be achieved it should seek to minimise, mitigate and compensate for any residual damage.</i></p> <p>The AONB Partnership considers that the ScottishPower Renewables proposals for development require the proposals to meet the aims of the statutory AONB Management Plan.</p>	<p>design/mitigation, in particular through the design of the underground cables through the AONB; and the siting of the substation and National Grid infrastructure outside the AONB. Effects on the special qualities of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.</p>
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	<p>The AONB Partnership acknowledge that the proposal to underground the necessary cables from the offshore development to the substations which during operational phases will minimise the negative impacts on the nationally designated AONB. It is the AONB partnership view that this is coherent with NPS 5 and in particular paragraph 2.8.9.</p>	<p><b>Table 29.4</b> of this chapter. The applicant notes that the AONB partnership are of the view that during the operational phase, the proposed East Anglia TWO project will minimise negative impacts on the AONB and that it is coherent with NPS 5.</p>
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	<p>The AONB Partnership have concern about the impact on the nationally designated AONB during the construction phase of the installation of the cables. In particular it raises concern about:</p> <ul style="list-style-type: none"> <li>- Impacts on landscape quality during construction and operation. The installation of underground cables will have a temporary negative impact on the AONB' landscape quality. It is further noted that infrastructure related to maintenance and inspection of the underground cables could have adverse impacts on the AONB.</li> <li>- Impacts on scenic quality during construction. The installation will have a negative impact on large vistas and long views during construction. The characteristic stimuli of light and space will be negatively impacted during the construction phase.</li> <li>- Impacts on relative wildness during construction. The introduction of large scale construction work including haul roads and the introduction of an</li> </ul>	<p>Landscape and visual effects of the construction of the onshore infrastructure on the landscape quality, scenic quality and relative wildness of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.</p> <p>Outline management plans, across a number of environmental topics, have been submitted with the DCO application. These outline management plans contain the key principles that provide the framework to discharge relevant DCO requirements to commence and implement construction of the proposed East Anglia TWO project (see <b>Appendix 6.2</b>).</p> <p>The Applicant recognises that production of outline management plans is an important element in the management and verification of the impacts of the proposed East Anglia</p>

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		obvious human influence during construction will adversely impact the AONB features.	TWO project (see <b>section 6.11</b> in <b>Chapter 6 Project Description</b> ).
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership have concern about the impact on the nationally designated AONB during the construction phase of the installation of the cables. In particular it raises concern about: - Impacts on relative tranquillity during construction. The introduction of a major construction site will negatively impact the purposes of the AONB in terms of the introduction of noise, light and presence of construction activity itself.	Landscape and visual effects of the construction of the onshore infrastructure on the tranquillity of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.  Outline management plans, across a number of environmental topics, have been submitted with the DCO application. These outline management plans contain the key principles that provide the framework to discharge relevant DCO requirements to commence and implement construction of the proposed East Anglia TWO project (see <b>Appendix 6.2</b> ).  The Applicant recognises that production of outline management plans is an important element in the management and verification of the impacts of the proposed East Anglia TWO project (see <b>section 6.11</b> in <b>Chapter 6 Project Description</b> ).
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership consider that the in combination impacts of the proposed EA1N and EA2 offshore infrastructure on some of the designating factors for the AONB, namely landscape quality and relative wildness, to be significant.	Landscape and visual effects of the construction of the onshore infrastructure on the landscape quality, scenic quality and relative wildness of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership note that the Landscape and Visual Impact Assessment has assessed the impact of the proposals from agreed viewpoints. However, it notes the development of the England Coast Path and would wish to see a further	England Coastal Path proposals to incorporate the Suffolk Coastal Path will be finalised and published in autumn 2019 and the new access is expected to be ready in 2020. In the meantime, the SLVIA assesses

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		<p>assessment of the development proposals based on those experiencing the AONB using the enhanced access entitlement.</p> <p>The AONB Partnership consider the need for an assessment of the impacts of users of the proposed England Coast Path. It acknowledges that it could not represent the experience from every step on the proposed England Coast Path but an assessment of the unbroken impacts for those using the route</p>	<p>effects on users of the Suffolk Coastal Path, in <b>Appendix 29.4</b> and summarised in <b>section 29.6</b> of this chapter.</p>
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	<p>The AONB Partnership considers that the in combination impacts of the proposals with existing developments such as Sizewell A, Sizewell B, the proposed Sizewell C, the proposed interconnectors (Nautilus and EuroLink) and wind energy infrastructure of Galloper and Gabbard have not been fully acknowledged or assessed.</p>	<p>Cumulative Effects with the Sizewell C Project are assessed in <b>Appendix 29.5</b>. Sizewell A and B, Galloper and Gabbard substations form part of the agreed baseline for assessments in <b>Appendix 29.3 and 29.4</b>.</p> <p>It was agreed with the ETG that there was insufficient information to assess the NG Ventures (Nautilus &amp; Eurolink) projects in accordance with the methodology for the EIA in line with Advice Note 17 (the Planning Inspectorate 2015).</p>
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	<p>The AONB Partnership consider that the impacts on the AONB designation factors such as landscape quality, scenic quality, relative wildness and relative tranquillity are significantly impacted in respect of the EA2 and are not coherent with the purposes of the AONB.</p>	<p>Landscape effects of the construction of the onshore infrastructure on the special qualities of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter. Undergrounding of the onshore cables will minimise the negative impacts on the nationally designated AONB during the operational phase. The siting of the East Anglia TWO onshore substation and National Grid infrastructure outside the AONB avoids significant effects on the special qualities of the AONB.</p>



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Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership consider that the impacts on the AONB designation factors such as landscape quality, scenic quality, relative wildness and relative tranquillity are significantly impacted in respect of the in combination impacts of EA1N, EA2 and existing and proposed energy production infrastructure on the Suffolk Coast and are not coherent with the purposes of the AONB.	Landscape effects of the construction of the onshore infrastructure on the special qualities of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter. Cumulative Effects with the Sizewell C Project are assessed in <b>Appendix 29.5</b> . Undergrounding of the onshore cables will minimise the negative impacts on the nationally design. The siting of the East Anglia TWO onshore substation and National Grid infrastructure outside the AONB avoids significant effects on the special qualities of the AONB.
Suffolk Coast and Heath AONB Partnership	25.03.2019 Section 42 Consultation Response	The AONB Partnership consider that the proposals should be revised to remove significant adverse impacts on the nationally designated AONB.	The Applicant considers that the proposed East Anglia TWO project minimises adverse effects on the special qualities of the AONB, in so far as the proposed East Anglia TWO project demonstrates good design and includes recognised mitigation, in particular through the design of the underground cables through the AONB which limit significant effects to the construction stage; the undergrounding of the onshore cables will minimise the negative impacts on the AONB. The siting of the East Anglia TWO onshore substation and National Grid infrastructure outside the AONB avoids significant effects on the special qualities of the AONB.
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	SPS objects to the lack of analysis of the cumulative landscape and heritage impacts of EA1(N) with EA2, National Grid substation and Sizewell C. Clarification is required on the impacts on the special qualities of the AONB and its setting,	Cumulative effects with the Sizewell C Project are assessed in <b>Appendix 29.5</b> , including consideration of special qualities of the AONB and its setting. Cumulative effects of cumulative HGV and other vehicular

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		including the cumulative HGV and other vehicular movements during the construction phase of the offshore and onshore infrastructure.	movements during the construction phase of the onshore infrastructure are assessed in <b>Chapter 26 Traffic and Transport</b> .
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	The LVIA (Chapter 29) shows that the visual impacts upon the AONB will be significant and permanent. However, the Technical Summary fails to reflect the magnitude of impact and fails in its conclusions to make any reference at all to the AONB. SPS considers that SPR has a duty to consider the purposes of the nationally designated AONB for these developments as outlined in DEFRA's guidance note (the relevant section is reproduced below from the DEFRA publication Product code PB 10747 REV 1/07): Additionally, it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas.	The effects of the construction and operation of the onshore infrastructure on the AONB have been extensively considered in the LVIA ( <b>Appendix 29.3</b> and in this chapter, summarised in <b>section 29.10</b> ). Significant effects on the AONB are assessed as being short-term during the construction phase (and therefore not permanent). The Applicant considers that the proposed East Anglia TWO project has paid due regard to the statutory purpose of the AONB, in so far as the proposed East Anglia TWO project demonstrates good design and includes recognised mitigation, in particular through the design of the underground cables through the AONB; and the siting of the substation and National Grid infrastructure outside the AONB.
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	The PEIR assesses that there will be significant long term and permanent effects on the area north of Friston within approximately 1km around the on-shore substations (page 80 Chapter 29 LVIA) with mitigation at 15 years (page 84). We support this conclusion but question whether the LVIA can be relied upon when it states that there will be no significant long term visual effects other than on view point 8 (Saxmundham Road, North of Friston), Viewpoint 9 (Aldeburgh Road, South of Friston) and at Grove Wood (Manor Farm) to northern edge of Friston.	Agreement on the conclusions that significant effects of the onshore substations will occur within a localised area is welcomed. 'With mitigation' impact assessments (at 15 years) have been updated to address changes in National Grid Infrastructure, the updated Outline Landscape Mitigation Plan (OLMP) and revised assumptions for woodland heights at 15 years post planting. Heights of woodland planting at 15 years post planting have been reduced from PEIR to ES, to address feedback from SCC/ESC, guidance and precedents from other NSIP projects. 'With



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			<p>mitigation' impact assessments have been updated in <b>Appendix 29.3</b> (landscape effects) <b>and 29.4</b> (visual effects), and summarised in <b>section 29.6</b> of this chapter.</p> <p>The methodology for the LVIA has been discussed and agreed with the LVIA ETG. All LVIA (and cultural heritage) viewpoints were discussed and agreed with the LVIA ETG (and the Archaeology &amp; Cultural Heritage ETG). The Applicant believes that the approach to the LVIA is robust and accepted by key stakeholders.</p>
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	As discussed during the recent meeting with SPR, post publication of the PEIR, SPS reaffirms that views from Grove Road across the landscape must be included within the landscape and visual impact assessment. Grove Road provides a series of viewpoints across an historic rural landscape that in all probability has remained substantially unchanged for centuries and will be obliterated if the substation goes ahead. Visualisations from Grove Road are essential to correctly record and illustrate the impact on receptors which will include not just those driving along Grove Road but those walking along the road to connect with the network of footpaths either side of the road and cyclists using cycle route 42 from Snape to Bramfield.	Two viewpoints were included from Grove Road in the PEIR at Viewpoint 3 ( <b>Figure 29.15</b> ) and Viewpoint 4 ( <b>Figure 29.16</b> ). An additional viewpoint has been added to the ES at the closest point of Grove Road at Viewpoint 14 ( <b>Figure 29.26</b> ).
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	We are also concerned that longer views from important viewpoints have not been identified or assessed. For example, chapter 29 LVIA <b>Figure 29.9</b> Onshore substation ZTV (with visual receptors) includes the Sandlings Long Distance Walking Route but not Snape Maltings. We consider that the long views from Snape Maltings, particularly the	The ZTV in <b>Figure 29.7</b> shows that there is no visibility of the substations from Snape Maltings, due to screening by intervening landform and vegetation.

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		upper floor of the concert hall, may be impacted and requires assessment.	
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	The realignment of the pylon line, including 4 sealing end compounds, will bring the wirescape closer to the heritage assets Little Moor Farm and High House Farm. This will have a significant unacceptable negative visual impact on the landscape and the setting of the heritage assets. No details are provided about the sealing end compounds which appear on the Indicative Landscape Mitigation Plan (but are not included within the key). There have only been minimal attempts to demonstrate the impacts of these and the overhead line realignment works on Friston as they do not appear in the Visualisations. Clarification is required on the visual impacts of these works.	The photomontage visualisations in <b>Figures 29.13 – 29.26</b> show the proposed National Grid overhead line modifications, including sealing end compounds. This National Grid infrastructure is also shown in the OLMP in <b>Figure 29.11a-c</b> , together with proposed mitigation. The landscape and visual impacts assessed in <b>Appendix 29.3-29.5</b> and summarised in this chapter include these National Grid overhead line modifications and infrastructure.
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	The indicative landscape masterplan shows large blocks of planting to the south and west of the Friston substation site. However, the scale and nature of the planting shows no regard to the setting of heritage assets or the character of the historic landscape and we are concerned that it will, of itself, be harmful.	The OLMP shown in <b>Figure 29.11a-c</b> has been developed since PEIR in consultation with the ETG and following public information day feedback. The planting has been designed to find a balance between the need to screen the substations and be set back from heritage receptors to maintain their open, agricultural setting. The landscape mitigation proposed is described in <b>section 29.3.4</b> of the chapter and in the separate Outline Landscape and Ecological Mitigation Strategy (OLEMS).
Suffolk Preservation Society	20.03.2019 Section 42 Consultation Response	We are also concerned that the proposed water management zones and screen planting do not reflect the existing landscape character and would appear alien and disruptive. The deeply rural character with its landmark features of the church	SUDS basins are proposed to the west and south-west of the substations, as shown in <b>Figure 29.11a-c</b> and will be designed in accordance with best practice (CIRIA, 2015). Effects on the setting of Friston Church and

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		and the windmill will be irrevocably altered and adequate mitigation is limited by the physical constraints. Therefore, against this backdrop SPS would expect that Gas Insulated options are advanced, which have a considerably smaller footprint (140m x 120m as opposed to the Air Insulated option at 140m x 325m) and provide a “wrapping” that is more visually palatable. Whilst the additional 3m increase in height compared to the air insulated variant must be carefully offset against the smaller footprint, on balance the Gas Insulated variant is preferable in terms of reduced bulk and a simpler silhouette.	Windmill are assessed in <b>Chapter 24 Archaeology and Cultural Heritage</b> . National Grid substation with AIS electrical infrastructure is assessed as the realistic worst-case in the LVIA. Visualisations showing the National Grid substation with GIS electrical infrastructure have been produced in <b>Figures 29.27 - 29.40</b> for comparison.
Public Health England	26.03.2019 Section 42 Consultation Response	It is important to ensure that any impact on tranquillity in open spaces is considered.	Landscape and visual effects of the construction of the onshore infrastructure on the tranquillity of the AONB are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.
Natural England	26.03.2019 Section 42 Consultation Response	The bringing on-shore of cables from EA2 and EA1N within the AONB is not ideal. That decision has involved technical considerations that Natural England cannot address but the examination process will confirm whether potential alternatives have been properly assessed. Assuming that the case for coming ashore in the AONB is upheld then Natural England is content that the embedded mitigation can deliver an operational scheme which will not have a significant impact on the statutory purpose of the area.	The Applicant welcomes the agreement that the embedded mitigation can deliver an operational scheme which will not have a significant impact on the statutory purpose of the AONB.
Natural England	26.03.2019 Section 42 Consultation Response	The impact of the construction will be significant. We would like to add that an important additional mitigation measure could be to find ways to speed up the completion of the cable route, albeit without compromising on care and attention to	Effects of the construction of the onshore infrastructure on the AONB special qualities are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.

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		reinstatement, so that this part of the AONB can return to its role in helping to deliver the statutory purpose of the area as soon as possible	Potential for additional mitigation measures to increase speed of construction are noted.
Natural England	26.03.2019 Section 42 Consultation Response	With the in-combination effect of several foreseeable and identified projects impacting on the AONB, Natural England wishes to see that all parties consider landscape net gain opportunities. And that there is an agreement on how this could be achieved with the AONB partnership in consultation with Natural England and others.	Enhancement measures will be considered and discussed with stakeholders in a process separate to this EIA and DCO application.
Natural England	26.03.2019 Section 42 Consultation Response	We support the embedded mitigation for the onshore components of the scheme i.e. the measures to protect the cliffs at the landfall site by setting the start of the cable ducts well back from those cliffs and using Horizontal Direct Drilling to avoid any harm to the beach; and the undergrounding of the cables through the AONB along a route which avoids the most sensitive landscape types and features. We believe that if this work is carried out carefully, especially with regard to full reinstatement, then there should be no significant effect on the AONB during the operational phase of the scheme. The significant impacts are, as the PEIR and LVIA recognise, associated with the construction phase.	The applicant welcomes the support of the embedded mitigation for the onshore components of the scheme. The assessment undertaken in the LVIA ( <b>Appendix 29.3 and 29.4</b> ) concurs that significant effects on the AONB should be limited to the construction phase and there should be no significant effects on the AONB during the operational phase.
Natural England	26.03.2019 Section 42 Consultation Response	An active construction period of three to four years may be 'short term' but this is still sufficient time to establish a long-term change in how people view and value this part of the AONB. Those seeking to enjoy the special qualities of the AONB, including its relative tranquillity will as 'receptors' be highly sensitive to an active 32m wide, 3km long construction corridor with fencing, lighting and	Effects of the construction of the onshore infrastructure on AONB special qualities are assessed in <b>Appendix 29.3</b> and summarised in <b>section 29.6</b> of this chapter.

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		heavy construction traffic and vehicles on the haul and access roads.	
Natural England	26.03.2019 Section 42 Consultation Response	The PIER and LVIA confirm a significant cumulative impact during the construction phase with the construction of Sizewell C. We support this conclusion and would add that the power station project and cable route could be discerned as part and parcel of the same scheme by the public. With both projects coinciding the public may also view this part of the AONB as being dominated by major construction and so avoid going there. Because of this we would question whether the conclusion at para 174 of the Non-Technical Summary is fully justified i.e. 'No significant tourism and recreation impacts were predicted as a result of the proposed East Anglia Two project. Tourism and recreation receptors would experience minimal visual impacts and only temporary physical obstruction, noise and traffic impacts'.	Agreement of the findings of the cumulative LVIA with Sizewell C ( <b>Appendix 29.5</b> ) are welcomed. Effects on tourism and recreation are assessed in full in <b>Chapter 30 Tourism, Recreation and Socio-Economics</b> . The NTS and Conclusions have been updated in line with ES chapters so that any change in impacts (and Section 42 comments on the NTS) are reflected in the ES.
Natural England	26.03.2019 Section 42 Consultation Response	The LVIA identifies the significant cumulative construction phase visual and landscape effects with Sizewell C as being 'medium term' which, using the LVIA's own categorisation equates to five to ten years. This contrasts with the expected three to four years (short term) for construction of the onshore infrastructure. This may be because the cable route construction will take that long but reinstatement would take longer and so a recovering cable route would continue to have an adverse effect in combination with the power station construction site, for an extended period? We would like clarification of this.	Clarification is provided in <b>Appendix 29.5</b> and <b>section 29.7</b> of this chapter.
Natural England	26.03.2019	The LVIA (para 12) says that: 'the undergrounding infrastructure at the landfall and within the onshore	The use of buried link boxes within underground chambers is confirmed in the

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Natural England	26.03.2019 Section 42 Consultation Response	The LVIA identifies a range of significant impacts from the landfall and undergrounding construction works and no significant effects for the operational phase. We agree that this is what can be expected if the final route is carefully selected and best practice is followed in terms of reinstatement. A principal landscape risk from undergrounding cables or pipelines is that changes to soil structure and drainage can produce changes to surface vegetation which can permanently mark out the route of the cable or pipe across the landscape. The careful removal, conservation and reinstatement of sub and top soils is therefore crucial. We know that this reinstatement can be very successful across ‘ordinary’ arable and improved pasture land. The risks are much greater where other natural and semi-natural habitats and vegetation are involved because they are much more susceptible to alterations to soil conditions and may never successfully recolonise the construction corridor.	The Applicant welcomes agreement that significant effects on the AONB should be limited to the construction phase and there should be no significant effects on the AONB during the operational phase (assuming best practice is followed in terms of re-instatement). Construction techniques will involve the careful removal, conservation and reinstatement of sub and top soils.
Natural England	26.03.2019	Given the above we welcome the confirmation in the LVIA that the landfall selection has sought to	The Applicant welcomes agreement that the aim of locating the onshore cable route

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	Section 42 Consultation Response	avoid the most sensitive landscapes of the AONB' and that the onshore cable route site selection has sought, 'wherever possible, to locate the cable route through open agricultural land'. Natural England officers have surveyed much of the proposed route corridor and it appears to mostly feature a continuity of arable farmland with some pasture within the AONB.	through less sensitive agricultural (arable/pasture) land has largely been achieved.
Natural England	26.03.2019 Section 42 Consultation Response	In relation to this we note that whilst arable and some pasture dominate the proposed route corridor there are two locations where woodland or scrub may be impacted. These areas are small and we cannot attest to their actual condition but from a landscape perspective they appear to be features which help to break up the otherwise farmed corridor between the coast and Leiston and so add some variety and character, as well as being associated with rights of way. As such options for minimising or avoiding harm to them should be explored, including of course replanting the affected sections of these vegetation belts in a way that is compatible with the buried cables. The two locations are: - South west of Dower House and a short distance from the coast where a patch of broadleaf woodland abuts a byway with just a small gap separating this from woodland associated with Dower House. This leaves a very narrow gap through which the route could go without perhaps impacting on either. - A band of continuous scrub (described as such by the ecology report) running south east from Halfway Cottages and also associated with a footpath and linked to the adjacent and extensive area of heathland.	Proposals for minimising or avoiding harm at these two locations are set in <b>section 29.3.4.2</b> of this chapter.



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Natural England	26.03.2019 Section 42 Consultation Response	With the in-combination effect of several foreseeable and identified projects impacting on the AONB, Natural England wishes to see that all parties consider landscape net gain opportunities. And that there is an agreement on how this could be achieved with the AONB partnership in consultation with Natural England and others.	Enhancement measures will be considered and discussed with stakeholders in a process separate to this EIA and DCO application.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils acknowledge that there will be some significant but temporary landscape and visual impacts arising from the construction phases of both projects, where these pass through the landscape between landfall and substation sites. SPR will be expected to put forward a comprehensive program of landscape restoration to ensure that harm to the fabric of the landscape is restored in the most effective way such that there are no long term residual adverse effects arising. It is expected that all hedgerows and woodlands/areas of tree cover that need to be removed should be surveyed in detail prior to removal in order that the post-construction landscape restoration program is fully informed by the existing landscape fabric baseline.	Detail of pre-construction surveys of hedgerows and woodland which need to be removed is detailed within the OLEMS, secured under the draft DCO.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The Councils are not satisfied that the various assessments adequately recognise the sensitivity and value of the receiving landscape outside the AONB. The definitions and evaluation of Susceptibility Value and Sensitivity of the receiving landscape and other receptors require a systematic review and discussion between the Councils and SPR to ensure that the findings of the final LVIA submitted are robust.	Further review of landscape receptors sensitivity (susceptibility and value) has been undertaken and reflected in the updated sensitivity assessments and significance judgements in the LVIA in <b>section 29.6</b> of this chapter and <b>Appendices 29.2-28.4</b> , following consultation with the LVIA ETG and Suffolk County Council and East Suffolk Council.



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Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	According to the assessments, the mitigation of visual impacts is dependent on the effective and timely delivery of mitigation planting. No more than an initial outline scheme of mitigation has been presented to date, although even at this stage, the Councils are concerned that some of the indicated tree species are unsuited to the prevailing landscape character, and are not native species despite the description as such in the documentation. Furthermore, the congested nature of the site (buildings and cable wayleaves) will lead to potentially competing interests of visual amenity, historic landscape/assets and the need for Sustainable Drainage System, suggest that delivering an effective scheme of mitigation will be extremely challenging and may not be possible in an effective and meaningful way. The Councils are concerned that the various competing interests for the mitigation of the wider range of adverse effects (noise, landscape harm, visual impact, drainage, heritage) could potentially be in conflict with each other and therefore at risk of being compromised in their effectiveness.	A fuller OLMP is presented in <b>Figure 29.11a-c</b> , described in <b>section 29.3.4</b> of this chapter and is presented in full in the OLEMS. The OLMP has been produced in consultation with SCC/SCDC and further to feedback at public information days. Proposed woodland planting areas have been updated to respond to local character and tree species have been updated to include only native species. SUDs basins have been located to the west and south-west of the substations. The OLMP ( <b>Figure 29.11a-c</b> ) is considered to afford the potential for an effective scheme of mitigation of the landscape and visual impacts of the onshore substations.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	Although visualisation of the Gas Insulated Substation (GIS) option for the National Grid substation is shown, the implications of this option for the design mitigation and consequent impacts of the scheme should be explored.	National Grid substation with AIS electrical infrastructure is assessed as the realistic worst-case in the LVIA and is shown in the photomontage visualisations in <b>Figures 29.13-29.26</b> . Visualisations showing the National Grid substation with GIS electrical infrastructure have been produced in <b>Figures 29.27 - 29.40</b> for comparison.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019	The Councils note the conclusions of both Chapter 29s and agrees that the presence of the onshore windfarm infrastructure will have significant visual	Agreement on the conclusions that significant effects of the onshore substations will occur within a localised area is

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	Section 42 Consultation Response	effects on views experienced by people in the local area near Friston, but do not necessarily agree that these will become 'not significant' 15 years post planting, as this will very much depend on the rate of establishment and growth of new planting. SPR state (224) that landscape mitigation planting will be coming into maturity at 15 years post planting. The Councils consider that this claim is unreliable because newly planted trees at 15 years post planting cannot be considered to be mature. At best they can only be regarded as maturing. East Suffolk can suffer notably dry summers and growth rates of new tree planting that can be reliably predicted in wetter parts of the country, cannot necessarily be relied on in East Suffolk. The Councils consider that the conclusion of 'not significant' at 15 years post planting in this respect cannot be assured.	welcomed. 'With mitigation' impact assessments (at 15 years) have been updated to address changes in National Grid Infrastructure, the updated OLMP and revised assumptions for woodland heights at 15 years post planting. Heights of woodland planting at 15 years post planting have been reduced from PEIR, to address feedback from SCC/ESC, guidance and precedents from other NSIP projects. 'With mitigation' impact assessments have been updated in <b>Appendix 29.3</b> (landscape effects) and 29.3 (visual effects) and summarised in <b>section 29.6</b> of this chapter.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	The LVIA's for each project do not include an assessment of the infrastructure associated with the connection of the National Grid substation to the overhead lines which will include up to four sealing end compounds and potentially one additional pylon associated with the overhead line realignment works.	The photomontage visualisations in <b>Figures 29.13 – 29.26</b> show the proposed National Grid overhead line modifications, including sealing end compounds. This National Grid infrastructure is also shown in the OLMP in <b>Figure 29.11a-c</b> , together with proposed mitigation. The landscape and visual impacts assessed in <b>Appendix 29.3-29.5</b> and summarised in this chapter include these National Grid overhead line modifications and infrastructure.
Suffolk County Council and Suffolk Coastal District Council	27.03.2019 Section 42 Consultation Response	NPS EN-1 (5.9.17) states that the Examining Authority should 'consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation'. The Councils are of the view	<b>Table 29.4</b> of this chapter. The design of the onshore substation site has been substantially progressed since PEIR and includes meaningful and deliverable mitigation measures which seek to minimise harm to the landscape. The Applicant considers that the proposed East Anglia

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		that this has not been achieved and the proposals result in significant permanent adverse effects visually and on the character of the landscape.	TWO project now demonstrates good design and includes recognised mitigation, in particular through the design of the underground cables and routing of the onshore cables through the least sensitive agricultural areas of the AONB; the siting of the substation and National Grid infrastructure outside the AONB and the design of the OLMP which reduces adverse effects of the onshore infrastructure on local character and views, developed in consultation with the LVIA ETG (including Suffolk County Council and East Suffolk Council). The mitigation of landscape and visual effects has been carefully considered in the LVIA, to minimise 'harm to the landscape' where possible.
National Grid	Section 42 Consultation Response	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	OLMP <b>Figure 29.11a-c</b> . Only slow growing low height species are proposed beneath overhead line conductors. Sufficient clearance has been maintained between overhead lines and trees/vegetation in the OLMP, with a precautionary 25m buffer applied for woodland planting areas.

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