

**EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO
OFFSHORE WIND FARM**

East Suffolk Council's and Suffolk County Council's Response to Key Relevant Representations.

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms - Response to Key Relevant Representations

Following publication of the Procedural Decision dated 21 May 2020 by the Examining Authority and Panel’s request, where possible and available, for early submission of comments on Relevant Representations, East Suffolk Council and Suffolk County Council has reviewed some key stakeholders’ Relevant Representations and provided comments. Relevant comments from stakeholders are summarised in Table 1, together with East Suffolk Council’s and Suffolk County Council’s position on the comments. Adjacent to each stakeholder it is stated whether the comments in the Relevant Representation apply to both projects or just one project.

Table 1: Summary of main comments from some key stakeholders and East Suffolk Council’s and Suffolk County Council’s position.

Topic	Summary of Main Comments from Stakeholder	East Suffolk Council’s and Suffolk County Council’s Position
Innogy Renewables UK Ltd – EA1N and EA2		
Cumulative Impacts	Innogy Renewables UK Ltd is currently developing the Galloper Extension Offshore Wind Farm. In their Relevant Representation they have identified potential spatial interactions and cumulative impacts with the EA1N and EA2 projects both onshore and offshore. The Galloper Extension Offshore Wind array area is located approximately 5km south of the southern boundary of EA2.	<p>The Councils understand that National Grid Electricity System Operator (NG-ESO) has offered grid connections to a number of projects which are anticipated in the future (namely the Nautilus Interconnector; the Eurolink Interconnector and the Galloper Extension (now known as the Five Estuaries)) and that a further connection offer is also likely to be made to the Greater Gabbard Extension. The intention is for these projects to connect to the National Grid substation proposed at Grove Wood, Friston which is part of the EA1N and EA2 applications. That would result in the enlargement/extension of the National Grid substation.</p> <p>The Councils maintain that the future energy projects which have been (or are likely to be) granted grid connection offers by NG-ESO should be included in the cumulative impact assessments for EA1N and EA2. While full information may not yet be available, National Grid is likely to be able to provide information on the effects of further grid connections on the National Grid Infrastructure proposed at Friston.</p>

National Grid Ventures (NGV) – EA1N and EA2		
<p>Cumulative Impacts</p>	<p>NGV is proposing to develop two high voltage direct current (HVDC) electricity Interconnector projects between Suffolk and Europe, the Nautilus and EuroLink Projects. NGV’s proposed Nautilus and EuroLink Interconnector Projects share the same connection offer location as SPR’s East Anglia ONE North and East Anglia TWO projects.</p> <p>NGV are working to identify potential sites for the location of the required converter station, landfall and associated cable routes for each project.</p> <p>NGV has stated that they may wish to participate during the Examination, in relation to their interests, and reserve the right to make further comments through the Examination process. These comments include, but are not limited to, the prospect of safeguarding unfettered and timely access to the proposed new National Grid Electricity Transmission (NGET) substation, being promoted in line with the respective connection agreements, from the National Grid Electricity System Operator (NGESO).</p>	<p>NGV’s Relevant Representation confirms that NG-ESO has offered grid connections, for the Nautilus Interconnector and EuroLink Interconnector Projects, at the National Grid substation proposed at Grove Wood Friston, which is part of the EA1N and EA2 applications. This would result in the enlargement/extension of the National Grid substation.</p> <p>NGV has stated that they wish to make comments, regarding the need to safeguard unfettered, and timely access, to the proposed new National Grid substation. NGV also submitted a representation in relation to the postponed Issue Specific Hearing 1 agenda, which provided additional commentary on the need to future proof the National Grid substation, for further connections. They also raised concerns that the works proposed at Grove Wood Friston, <i>“indicate a constrained site when fully constructed and this causes concern, as to the availability of space, for the construction and physical infrastructure of future connections”</i>. The Councils are also concerned about the capacity of the site to accommodate the construction and operation of any National Grid substation extensions, and particularly, the consequential impacts on the community and environment.</p> <p>NGV has stated in their representation to the Planning Inspectorate, in relation to the postponed Issue Specific Hearing 1, that NG-ESO has confirmed that extensions to the National Grid substation, proposed at Grove Wood Friston, would be necessary to accommodate the NGV project’s connections. The site area required for these connections (1.3 hectares) is detailed in a Q&A document published on the Nautilus Interconnector webpage (https://www.nationalgrid.com/document/132456/download).</p>

		<p>The Councils maintain that the future energy projects which have been offered, or are likely to be offered, grid connection offers by NG-ESO, should be included in the cumulative impact assessments for EA1N and EA2. While full information may not yet be available, sufficient information is available, specifically relating to the future expansion of the Associated Development, for this to reasonably require an update to the cumulative impact assessment, consistent with Advice note 17. Furthermore, the Councils consider this information could readily be supplemented by NGET, to provide additional clarity.</p> <p>The Councils consider that, given the proposed National Grid substation has been identified by NGET for the connection of projects in addition to EA1N and EA2, it is being considered by NGET as a strategic connection point. Therefore, the implications of this strategic role, and the impacts of specific works where they are known in outline, should be fully considered, and understood by the public, consultees and the Examining Authority. The Councils consider that these issues are likely to, modify the local impacts of the proposal, inform consideration of site capacity, and should inform the design of the proposal.</p>
Historic England – EA1N and EA2		
<p>Archaeology and Cultural Heritage</p>	<p>Historic England’s principal concern is in relation to the proposed development of the substations and the cumulative impact of this new infrastructure on the significance of the grade II* listed Church of St Mary at Friston. Historic England highlight that the phases of building illustrate ecclesiastical design and patterns of</p>	

	<p>worship and show the significant role of the church within the community. The church's setting enhances its prominence and adds to the appreciation of the building. The concerns raised are:</p> <ul style="list-style-type: none"> • The scale and appearance of the development would significantly change the character of this rural setting and compromise and completely obscure views to the church from the north and from the church looking northwards. • The development would also greatly impact on key views of the church from the south, which would be seen against a backdrop of the substations. • Historic England consider the development would result in a very high level of harm to the significance of the grade II* church. • Historic England is concerned the proposals for screening and mitigation planting will also bring about further changes to the setting of the church. 	<p>These points are in accordance with East Suffolk Council's and Suffolk County Council's own position.</p>
<p>Natural England – EA2 ONLY</p>		
<p>Seascape, Landscape and Visual Amenity</p>	<p>Natural England has set out a summary of their key concerns in Table 5.2 – EA2 Main Issues and Associated Risk Ratings within their Relevant Representations. The main issues highlighted are:</p>	

	<ul style="list-style-type: none"> • Natural England consider that the NPS requirements for 'good design' have not yet been fully applied in the design of the EA2 scheme. And as a consequence, the statutory purpose of the AONB will be adversely affected by the EA2 proposal as it is currently configured. • Significant cumulative effects with other plans and projects. • The revised design doesn't provide any embedded mitigation in terms of proximity to the coast. • Natural England disagrees with the level of significance identified by the Applicant in relation to/on landscape receptors, AONB Special Qualities, viewpoints and receptors and coastal path. With Natural England concluded that the impacts are significant. • Night-time effects of navigational lighting have not been assessed for rural locations 	<p>These points are in accordance with East Suffolk Council's and Suffolk County Council's own position.</p>
		<p>East Suffolk Council and Suffolk County Council recognise that they did not discuss this matter with the Applicants during consultation and agree that this is an appropriate addition to the assessment</p>

	<ul style="list-style-type: none"> Note about the visible height of off-shore wind turbines in respect of EA2 (p5 of 43) 	East Suffolk Council and Suffolk County Council defer to the opinion and expertise of Natural England on this matter.
Natural England – EA1N ONLY		
Seascape, Landscape and Visual Amenity	<p>Natural England has set out a summary of their key concerns in Table 5.2 – EA1N Main Issues and Associated Risk Ratings within their Relevant Representations. The main issues highlighted are:</p> <ul style="list-style-type: none"> Night-time effects of navigational lighting have not been assessed for rural locations 	East Suffolk Council and Suffolk County Council recognise that they did not discuss this matter with the Applicants during consultation and agree that this is an appropriate addition to the assessment.
	<ul style="list-style-type: none"> Significant cumulative effects with the EA2 OWF project. 	This point is in accordance with East Suffolk Council’s and Suffolk County Council’s own position.