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# East Anglia ONE North and East Anglia TWO Offshore Windfarms

## Draft Statement of Common Ground Suffolk Preservation Society

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited

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



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## Glossary of Acronyms

ADBA	Archaeological Desk Based Assessment
AONB	Area of Outstanding Natural Beauty
CIA	Cumulative Impact Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
ExA	Examining Authority
LVIA	Landscape and Visual Impact Assessment
NPPF	National Planning Policy Framework
NPS	National Policy Statement
OLEMS	Outline Landscape and Ecological Management Strategy
PD	Procedural Decision
PIER	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PRoW	Public Right of Way
RAG	Red Amber Green
SoCG	Statement of Common Ground
SPS	Suffolk Preservation Society
SLVIA	Seascape, Landscape and Visual Amenity
WSI	Written Scheme of Investigation



## Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North 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.
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site / ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
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.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.



Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.



# 1 Introduction

## 1.1 Background

1. This document is applicable to both the East Anglia TWO and East Anglia ONE North Applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decision on document management of 23<sup>rd</sup> December 2019 (PD-004). A small number of rows within **Table 6** relate only to East Anglia TWO or East Anglia ONE North only, as indicated by the colour coding within the tables. Whilst this document has been submitted to both Examinations, if the remaining sections of this document are read for one project submission there is no need to read them for the other project submission.
2. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and Suffolk Preservation Society (SPS) in relation to the East Anglia TWO project and the East Anglia ONE North project (the Projects). It identifies areas of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications) where matters are agreed or not agreed between the parties.
3. The Applicants have had regard to the guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.
4. This SoCG has been structured to reflect topics of the Applications which are of interest to SPS. Topic specific matters agreed, not agreed and actions to resolve between the Applicants and SPS are included within this SoCG.
5. The tables presented below represent the SoCG with the Applicants and SPS in respect of the following topics:
  - Onshore Archaeology;
  - Settings of Onshore Cultural Heritage (including heritage settings);
  - Offshore Seascape, Landscape and Visual Amenity (SLVIA); and
  - Landscape and Visual Impact Assessment (LVIA).
6. Throughout the SoCG the phrase "Agreed" identifies any point of agreement between the Applicants and SPS. The phrase "Not Agreed" identifies any point that is not yet agreed between the Applicants and SPS.
7. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicants and SPS to reach agreement on the point wherever possible, or



refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.

8. The matters considered within this SoCG apply only to SPS's remit, which encompasses the natural and built heritage within Suffolk.

## **1.2 The Development**

9. The key offshore components of each Project will comprise:

- Offshore wind turbines and their associated foundations;
- Offshore platforms - up to four offshore electrical platforms and their associated foundations supporting some of the windfarm's electrical equipment, and up to one construction, operation and maintenance platform and associated foundations that may cater for personnel and activities required during the construction phase and operation and maintenance of the windfarm;
- Sub-sea cables between wind turbines and offshore electrical platforms (inter-array), between separate offshore platforms (platform link cables) and between offshore electrical platforms and the landfall (export cables);
- Scour protection around foundations and on inter-array, platform link and export sub-sea cables as required; and
- Potential for one meteorological mast and its associated foundations for monitoring wind speeds during the operational phase of the windfarm.

10. The key onshore components of each Project will comprise:

- The landfall site with up to two transition bays to connect the onshore and offshore cables;
- Up to six onshore cables, up to two fibre optic cables and up to two distributed temperature sensing cables installed underground (some or all of which may be installed in ducts) and associated jointing bays installed underground;
- Onshore substation; and
- Electrical cable connection between the onshore substation and National Grid substation.

11. National Grid infrastructure will also be required to connect each Project to the national electricity grid. Key components of the National Grid infrastructure which is common to both Projects will comprise:

- National Grid substation;
- Cable sealing end compounds and a cable sealing end (with circuit breaker) compound; and





- Realignment of the existing overhead lines; including the reconstruction or replacement of up to three existing overhead pylons in proximity to the National Grid substation and the addition of up to one new pylon in close proximity to existing overhead pylons.

### 1.3 Summary of Agreed, Not Agreed and Outstanding Matters

12. **Table 1** provides a summary of the matters agreed, not agreed and those which are outstanding between the Applicants and SPS for each of the relevant SoCG topic areas. For further information on matters that are outstanding / under discussion and for which the Applicants and SPS are working to address during the examination period, please refer to the Notes column of **Table 3**, **Table 4**, **Table 6** and **Table 8**.

**Table 1 Summary of Agreed, Not Agreed and Outstanding Matters**

Topic	Summary
Onshore Archaeology	All matters relating to the Existing Environment and Assessment Methodology have been agreed.  Matters relating to Assessment Conclusions and Mitigation currently remain under discussion.
Setting of Onshore Heritage Assets	All matters relating to the Existing Environment have been agreed.  Matters relating to Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.
SLVIA	All matters relating to the Existing Environment have been agreed.  Matters relating to the Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.
LVIA	All matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.



## 2 Statement of Common Ground

13. A summary of the consultation undertaken to date with SPS and the matters agreed or not agreed between the Applicants and SPS (based on discussions and information exchanged between the Applicants and SPS during the pre-Application and post-Application phases of the Applications) are set out below for each of the SoCG topic areas.

### 2.1 Archaeology and Cultural Heritage

14. The Projects have the potential to impact upon archaeology and cultural heritage. **Chapter 24 Archaeology and Cultural Heritage** of the Environmental Statement (ES) (APP-072), together with **Appendices 24.1 to 24.8** (APP-512 to APP-521), provide an assessment of the significance of these impacts.
15. **Table 2** provides an overview of consultation undertaken with SPS regarding archaeology and cultural heritage. Further details on the stakeholder engagement process for archaeology and cultural heritage can be found in the **Consultation Report** (APP-029).

**Table 2 Summary of Consultation with SPS Regarding Archaeology and Cultural Heritage**

Date	Contact Type	Topic
<b>Pre-Application</b>		
23 <sup>rd</sup> January 2019	Meeting	Project update and Archaeology and Cultural Heritage update, including Archaeological Desk Based Assessment (ADBA) (and settings assessment), Geophysical Survey and key impacts and proposed mitigation.
8 <sup>th</sup> March 2019	Meeting	Discussions with SPS as a member of the Expert Topic Group (ETG) on Cultural Heritage and Archaeology. Further forum for matters to be discussed with SPS including additional archaeology surveys.
<b>Post-Application</b>		
20 <sup>th</sup> January 2020	Written correspondence	Feedback received via SPS' Relevant Representation.
10 <sup>th</sup> March 2020	Written correspondence	SPS provided their initial comments on a draft template of the SoCG.
11 <sup>th</sup> June 2020	Written correspondence	SPS provided comments on a draft SoCG.
15 <sup>th</sup> October 2020	Written correspondence	SPS provided comments on a draft SoCG.



16. **Table 3** presents the matters agreed or not agreed in relation to onshore archaeology. **Table 4** presents the matters agreed or not agreed in relation to the setting of onshore heritage assets.

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**Table 3 Onshore Archaeology**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
<b>Environmental Impact Assessment</b>						
SPS-001	Existing Environment	Sufficient desk-based survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	None
SPS-002	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Applicable	<p>SPS questions whether sufficient trial trenching (including land to the north of Friston church and the public right of way forming the parish boundary (E/354/006/0)) has been undertaken to inform the existing environment but defers to Suffolk County Council (SCC) as the relevant statutory partner on this issue.</p> <p>The Applicants note agreement with East Suffolk Council (ESC) and SCC (together 'the Councils') that sufficient non-intrusive survey data has been collected to inform the assessment, although the Councils do not agree that sufficient trial trenching has been undertaken at key pinch points, at Grove Road, or at the Hundred / parish boundary public right of way. This matter remains under discussion between the Applicants and the Councils.</p>
SPS-003	Existing Environment	The ES includes sufficient information and data to adequately characterise	Agreed	Agreed	Not Applicable	<p>SPS questions whether sufficient trial trenching (including land to the north of Friston Church and the public right of way forming the parish boundary (E/354/006/0)) has been undertaken to inform the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		the baseline environment in terms of onshore archaeology.				existing environment but defers to SCC as the relevant statutory partner on this issue.  The Applicants note agreement with the Councils that sufficient non-intrusive survey data has been collected to inform the assessment, although the Councils do not agree that sufficient trial trenching has been undertaken at key pinch points, at Grove Road, or at the Hundred / parish boundary Public Right of Way (PRoW). This matter remains under discussion between the Applicants and the Councils.
SPS-004	Assessment Methodology	The impact assessment methodologies adopted for the Environmental Impact Assessment (EIA) provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Agreed	None
SPS-005	Assessment Methodology	The worst case scenario presented in the assessment of onshore archaeology is appropriate.	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
SPS-006	Assessment Conclusions	The assessment of impacts presented are appropriate.	Agreed	Agreed	Not Applicable	SPS defers to SCC as the relevant statutory partner on this issue. The Applicants are agreed with the Councils on the conclusions of the assessment for the baseline identified within the assessment.
SPS-007	Assessment Conclusions	The assessment of cumulative impacts of East Anglia TWO and East Anglia ONE North is consistent with the agreed methodologies.	Agreed	Agreed	Not Applicable	SPS defers to SCC as the relevant statutory partner on this issue. The Applicants are agreed with the Councils on the conclusions of the cumulative assessment of the Projects together for the baseline identified within the assessment.
SPS-008	Assessment Conclusions	The assessment of cumulative impacts with future projects is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	SPS do not agree with the Applicants' decision to screen the proposed Interconnector projects (i.e. Nautilus, Eurolink, the Sizewell to Canterbury Grid Interconnector (SCD1) and the Sizewell to Sellindge Grid Interconnector (SCD2)) out of the cumulative impact assessment (CIA). However, SPS defer to SCC as the relevant statutory partner on this issue.  This is a matter that remains not agreed between the Applicants and the Councils. The parties do not expect to reach common ground on this matter.
SPS-009	Mitigation	Appropriate mitigation measures have been put forward for onshore	Agreed	Agreed	Not Applicable	SPS defers to SCC as the relevant statutory partner on this issue. The Applicants have agreed with the Councils to update the <b>Outline Written Scheme of Investigation (Outline WSI)</b> (APP-



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		archaeology (e.g. within the <b>Outline Written Scheme of Investigation (Onshore)</b> (APP-582)) and the <b>Outline Pre-Commencement Archaeological Execution Plan (Onshore)</b> (APP-597).				582). Until an updated <b>Outline WSI</b> has been produced this matter remains not agreed between the Applicants and the Councils.
<b>Draft Development Consent Order</b>						
SPS-010	Wording of Requirement (s)	The wording of Requirement 19 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a pre-commencement archaeology execution plan to detail the scope of the archaeological works is appropriate and adequate.	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.



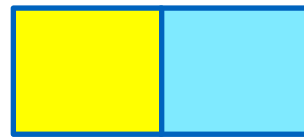
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
SPS-011	Wording of Requirement (s)	The wording of Requirement 20 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a written scheme of archaeological investigation detailing the methodology, mitigation and recording of archaeological investigation works is appropriate and adequate.	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.
Other Matters as Required						
N/A						





**Table 4 Setting of Onshore Heritage Assets**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
<b>Environmental Impact Assessment</b>						
SPS-012	Existing Environment	Sufficient desk-based survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	None
SPS-013	Assessment Methodology	The consideration of Historic England guidance within the impact assessment methodologies adopted for the EIA provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Agreed	SPS agrees that the correct guidance is being used but considers that its application underestimates the impact on setting of designated heritage assets.  The Applicants welcome SPS' agreement on this statement but do not agree that the application of guidance has underestimated the impact of the Projects on the setting of designated heritage assets.
SPS-014	Assessment Methodology	The impact assessment methodologies have been applied correctly in the assessment of potential impacts of the Projects.	Agreed	Agreed	Not Agreed	SPS considers that the impacts on cultural heritage throughout the construction and decommissioning phases of the scheme have not been properly assessed. Therefore, SPS considers that an accurate assessment of the overall heritage impact cannot be made.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>SPS considers the Applicants' assessment of setting is overly reliant upon a purely visual assessment.</p> <p>SPS provide Friston Church as an example, in that <b>Paragraph 104</b> to <b>Paragraph 109</b> of <b>Appendix 24.7</b> (APP-519) is contrary to the NPPF's definition of setting – '<i>the surroundings in which a heritage asset is experienced</i>'.</p> <p>SPS is of the position that the weight given to inter-visibility within the assessment results in an underestimation of the impact on setting and thereby significance of designated heritage assets. Setting can also be impacted by noise, dust, vibration, lighting at all stages of the Project. Also impacts on the historic relationship between cultural heritage assets will impact their significance.</p> <p>The Applicants do not agree that the assessment is overly reliant upon visual assessments. In the settings assessment (<b>Appendix 24.7</b> (APP-519 and APP-520)) the Applicants have evaluated how the wider setting (from both a visual setting and historic / landscape character setting) contributes to the significance of the asset.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						Noise has been considered within the assessment but is scoped out of further assessment within <b>paragraph 14 of Appendix 24.7</b> (APP-519). The generation of air quality (dust) impacts are considered construction-phase impacts, which have been scoped out of the assessment of the setting of heritage assets on basis these are temporary ( <b>paragraph 12, Appendix 24.7</b> (APP-519)).
SPS-015	Assessment Methodology	The viewpoints selected for the assessment of onshore heritage asset setting are adequate and acceptable to understand and assess the potential impacts.	Agreed	Agreed	Not Agreed	SPS consider that some viewpoints presented in the ES are either lacking or unreliable and do not inform the assessment in a meaningful way. For example, <b>Cultural Heritage Viewpoint 5 at Woodside Farm</b> (found within APP-520) is positioned such that the views of the substation site are blocked by buildings, and <b>Cultural Heritage Viewpoint 8 at Friston Churchyard</b> (found within APP-520) does not adequately reflect views of the substations site which would be available from other locations within the churchyard. SPS do not consider that the viewpoints need to include part or all of the assets to fully illustrate the impact on its setting. Viewpoints from and within assets would better illustrate the impact of the Projects



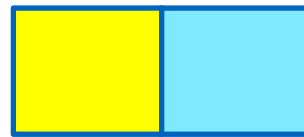
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>on the scheme. Also, viewpoints illustrating the impact on long views of assets, for example from PROWs, are required to fully represent heritage impact.</p> <p>The Applicants agreed the assets to be included in the assessment of onshore heritage asset setting with the ETG at the 23<sup>rd</sup> January 2019 ETG meeting and identified appropriate viewpoints to inform the assessment. Viewpoints to assess the setting must include the asset being assessed and how the Projects interacts with the setting of the asset.</p> <p>As such, <b>Cultural Heritage Viewpoint 5 at Woodside Farm</b> (found within APP-520) shows Woodside Farm but views of the substation site are obstructed because the only views that interact are from the adjacent track.</p> <p><b>Cultural Heritage Viewpoint 8 at Friston Churchyard</b> (found within APP-520) is specifically selected to show views of the Friston War Memorial, as agreed with the ETG. Views of the Church of St Mary, Friston are captured within <b>Cultural Heritage Viewpoint 1</b> (found within APP-520), <b>Cultural Heritage Viewpoint 2</b> found within APP-520), <b>Cultural</b></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p><b>Heritage Viewpoint 4</b> (found within APP-520), <b>Cultural Heritage Viewpoint 8</b> (found within APP-520), <b>Landscape and Visual Viewpoint 6</b> (APP-409) and <b>Landscape and Visual Viewpoint 9</b> (APP-412).</p> <p>The Applicants consider the assessment of the setting of onshore heritage assets to be robust and appropriate. The photomontages produced for the assessment of the setting of onshore heritage assets are considered to meet appropriate standards and are suitable to inform judgements on settings impact of the onshore infrastructure, while recognising that all photomontages have limitations as set out in <b>section 6.3.29.2</b> in <b>Appendix 29.2</b> (APP-566).</p>
SPS-016	Assessment Methodology	The worst case scenario presented in the assessment of onshore heritage asset setting is appropriate.	Agreed	Agreed	Agreed	None
SPS-017	Assessment Conclusions	The ES includes sufficient information and data to adequately assess and draw conclusions on impacts caused	Agreed	Agreed	Not Agreed	SPS considers that the impacts on cultural heritage throughout the construction and decommissioning phases of the scheme have not been properly assessed. Therefore, SPS



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		by change in the setting of heritage assets.				<p>considers that an accurate assessment of the overall heritage impacts has not been made.</p> <p>SPS consider that some viewpoints presented in the ES are insufficient in terms of number and reliability to inform an assessment of the setting of onshore heritage assets. For example, <b>Cultural Heritage Viewpoint 5 at Woodside Farm</b> (APP-520) is positioned such that the views of the substation site are blocked by buildings. Additional viewpoints from the rear of Woodside Farm would better inform the assessment of impact on the heritage asset.</p> <p><b>Cultural Heritage Viewpoint 8 at Friston Churchyard</b> (APP-520) does not adequately reflect views of the substation site which would be available from other locations within the churchyard, further viewpoints to illustrate the impact on this highly heritage graded asset should be included.</p> <p>The Applicants agreed the assets to be included in the assessment of onshore heritage asset setting with the ETG at the 23<sup>rd</sup> January 2019 ETG meeting and identified appropriate viewpoints to inform the assessment. Viewpoints to assess the setting must include</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>the asset being assessed and how the Projects interacts with the setting of the asset.</p> <p>The Applicants consider the assessment of the setting of onshore heritage assets to be robust and appropriate. The photomontages produced for the assessment of the setting of onshore heritage assets are considered to meet appropriate standards and are suitable to inform judgements on settings impact of the onshore infrastructure, while recognising that all photomontages have limitations as set out in <b>section 6.3.29.2</b> in <b>Appendix 29.2</b> (APP-566).</p> <p>SPS consider that the impact on cultural heritage assets' setting from noise, dust, vibration, lighting and their historic relationship with other cultural heritage assets is not fully considered within the assessment.</p> <p>Noise has been considered within the assessment but is scoped out of further assessment within <b>paragraph 14</b> of <b>Appendix 24.7</b> (APP-519). The generation of air quality (dust) impacts are considered construction-phase impacts, which have been scoped out of the assessment of the setting of heritage</p>

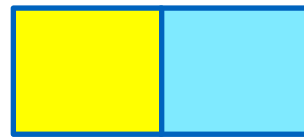


ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						assets on basis these are temporary ( <b>paragraph 12, Appendix 24.7</b> (APP-519).
SPS-018	Assessment Conclusions	The conclusions of the assessment of onshore coastal heritage assets setting are appropriate with specific reference to impact upon heritage significance as a result of change in the setting of heritage assets from the presence of offshore infrastructure. It is noted that this is separate from SLVIA, which is assessing a different impact and effect scenario in this regard.	Agreed	Agreed	Agreed	None
SPS-019	Assessment Conclusions	The assessment of onshore heritage asset setting conclusions in terms of impact magnitude and significance are correct, with specific reference to impact upon heritage as a result of change in the setting of heritage assets from the presence of permanent onshore infrastructure.  See ES:	Agreed	Agreed	Not Agreed	SPS considers that the impact of the substation site on the listed buildings in Friston has been underestimated. SPS does not agree that the substations will have an adverse impact of low magnitude on Friston Church resulting in an effect of moderate significance. The relationship and inter-visibility between the church, as a landmark building, the Public Right of Way (PRoW) and the farmhouses to the north is central to its significance.





ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		<ul style="list-style-type: none"> <li>• <b>Chapter 24 Archaeology and Cultural Heritage</b> (APP-072);</li> <li>• <b>Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes (Part 1 of 2)</b> (APP-519); and</li> <li>• <b>Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes (Part 2 of 2)</b> (APP-520).</li> </ul>				<p>SPS do not agree that Little Moor Farm, High House Farm, Woodside Farmhouse and the war memorial will experience an adverse impact of low or medium or negligible magnitude respectively. The substation would be within 500m of these assets.</p> <p>SPS are concerned about the loss of 500m of the historic PRoW (E/354/006/0) to the north of Friston Church and that the total loss of associated views of the church will impact the significance of the church.</p> <p>The Applicants wish to highlight that the matters outlined above primarily reflect a difference in professional judgement when drawing conclusions of the assessment. The Applicants have committed to undertaking a review of the historic landscape character associated with the PRoW (and historic parish boundary) and will address this additional baseline information with respect to the settings assessment of Friston Church, Little Moor Farm, High House Farm and Woodside Farmhouse. This information will be presented in a clarification note.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>The Applicants consider that the low magnitude of change associated with Friston Church is primarily related to the loss of views of the church tower when approaching Friston from the north along the footpath from Little Moor Farm; however, it should be noted that this is only one view of the church and therefore the magnitude of change is localised. The upper parts (i.e. the harmonic filters) of the onshore substations would also be just visible in other valued views of the church and in views north from the churchyard but, collectively, these changes would not substantively increase the adverse impact caused by the loss of the sequential views from the north.</p> <p>The Applicants also consider that the low or medium magnitude of change associated with Little Moor Farm, High House Farm and Woodside Farmhouse is appropriate as this is primarily related to the visibility and proximity of the substations and the resulting industrialising of landscape character in the proximity of each asset.</p> <p>In order to undertake an assessment of the contribution of historical setting to significance, an independent contractor (Headland</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						Archaeology) was commissioned. The subsequent conclusions and narrative provided in <b>section 24.6.2.1</b> are based on and supported by this independent study ( <b>Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes</b> (APP-519)). The Applicants are therefore of the view that an understanding of the heritage assets and the magnitude of change associated with the Projects has been adequately captured and potential impacts have been robustly assessed.
SPS-020	Assessment Conclusions	The assessment of cumulative impacts of East Anglia TWO and East Anglia ONE North is appropriate and adequate.	Agreed	Agreed	Agreed	None
SPS-021	Assessment Conclusions	The assessment of cumulative impacts with future projects is appropriate and adequate.	Agreed	Agreed	Not Agreed	SPS do not agree that the National Grid Ventures Interconnector projects (Nautilus, Eurolink, SCD1 and SCD2) should have been excluded from an assessment of cumulative impacts.  A CIA has been carried out for each of the considered receptor topics in <b>Chapters 7 to 30</b> (APP 055-078) of the ES. The approach used



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>for the CIA follows Planning Inspectorate Advice Note 17.</p> <p>Following the guidance in Advice Note 17, the abovementioned projects were not considered in the CIA because at the time the Projects' CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales).</p> <p>The abovementioned projects will require their own EIA and as part of that process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Projects in each of their respective EIAs as they progress through the planning process.</p> <p>The approach used for the Projects' CIA follows Planning Inspectorate Advice Note 17.</p>
SPS-022	Mitigation	The embedded and additional mitigation measures proposed within <b>Section 24.3.3</b> of the ES (APP-072) are appropriate in terms of seeking to minimise adverse impacts to heritage setting.	Agreed	Agreed	Not Agreed	<p>Due to the historic landscape character and the scale of the development, SPS does not agree that the impacts on the heritage assets in Friston are capable of adequate mitigation. SPS does not agree that the proposed planting adequately mitigates the impacts upon the setting of heritage assets around the substation</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>site, given the proposed planting in itself introduces uncharacteristic landscape features that impact the wider setting of High House Farm, Little Moor Farm, Woodside Farm, Friston House and Friston Church and war memorial from an agricultural landscape setting to one of an industrialised character with screening.</p> <p>An Outline Landscape Mitigation Plan has been submitted as part of the <b>Outline Landscape and Ecological Management Strategy</b> (OLEMS) (APP-584) which seeks, among other objectives, to reduce adverse impacts on the heritage assets at Friston. The Outline Landscape Mitigation Plan has been developed in consultation with the ETG, a key output of which was to maintain a separation between new woodland planting the identified listed buildings, such that these listed buildings are not enclosed by the new planting. The proposed planting therefore takes into consideration historic landscape and re-establishing historic field boundaries.</p> <p>In areas to the immediate north of Friston, the re-establishment of historic field boundaries, filling gaps in existing hedgerows and</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>introducing field boundary trees has been proposed to provide layered screening, rather than large-scale woodland planting close to the village. This allows the 'setting' of Friston to be retained (rather than being contained by woodland).</p> <p>The Applicants believe they have undertaken exhaustive efforts to mitigate impacts to the setting of cultural heritage assets and that the measures within the OLEMS mitigate, as far as possible, impacts to heritage setting.</p>
<b>Draft Development Consent Order</b>						
SPS-023	Wording of Requirement(s)	The wording of Requirement 12 provided within the <b>draft DCO</b> (APP-023) with reference to the design of the onshore substation is appropriate and adequate in terms of the setting of onshore heritage assets.	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.
SPS-024	Wording of Requirement(s)	The wording of Requirement 14 provided within the <b>draft DCO</b> (APP-023) within reference to a written landscape management	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		plan is appropriate and adequate in terms of setting of onshore heritage assets.				
Other Matters as Required						
N/A						

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## 2.2 Seascape, Landscape and Visual Amenity

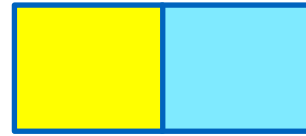
17. The offshore components of the Projects have the potential to impact upon seascape, landscape and visual amenity. **Chapter 28 Seascape, Landscape and Visual Amenity** of the ES (APP-076) provides an assessment of the significance of these impacts.
18. **Table 5** provides an overview of consultation undertaken with SPS regarding SLVIA. Further details on the stakeholder engagement process for consultation undertaken with SPS regarding SLVIA can be found in the **Consultation Report** (APP-029).

**Table 5 Summary of Consultation with SPS Regarding Seascape, Landscape and Visual Amenity**

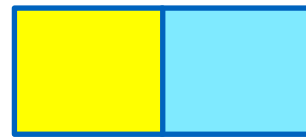
Date	Contact Type	Topic
<b>Pre-Application</b>		
20 <sup>th</sup> March 2019	Written correspondence	Feedback received via Section 42 consultation (responses to the Preliminary Environmental Information Report (PEIR)) in relation to SLVIA matters.
<b>Post-Application</b>		
20 <sup>th</sup> January 2020	Written correspondence	Feedback received via SPS' Relevant Representation.
10 <sup>th</sup> March 2020	Written correspondence	SPS provided their initial comments on a draft template of the SoCG.
11 <sup>th</sup> June 2020	Written correspondence	SPS provided comments on a draft SoCG.
15 <sup>th</sup> October 2020	Written correspondence	SPS provided comments on a draft SoCG.

19. **Table 6** presents the matters agreed or not agreed in relation to SLVIA.

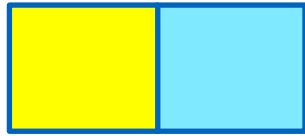


**Table 6 Seascape, Landscape and Visual Amenity**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
<b>Environmental Impact Assessment</b>						
SPS-101	Existing Environment	Sufficient survey data has been collected to appropriately characterise the baseline environment in terms of SLVIA and inform the assessment.	Agreed	Agreed	Not Applicable	SPS defers to Natural England and the local authorities on this matter.  The Applicants note that this matter is agreed in the SoCG with the Councils. Progress has been made with Natural England on this matter and a SoCG with Natural England in relation to SLVIA will be submitted at Deadline 3.
SPS-102	Assessment Methodology	The impact assessment methodologies used for the SLVIA provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Not Applicable	SPS defers to Natural England and the local authorities on this matter.  The Applicants note that this matter is agreed in the SoCG with the Councils. Progress has been made with Natural England on this matter and a SoCG with Natural England in relation to SLVIA will be submitted at Deadline 3.
SPS-103	Assessment Methodology	The worst case scenario in terms of design parameters and visibility presented in the SLVIA assessment is appropriate.	Agreed	Agreed	Not Applicable	SPS defers to Natural England and the local authorities on this matter.  The Applicants note that this matter is agreed in the SoCG with the Councils. Progress has been made with Natural England on this matter and a



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						SoCG with Natural England in relation to SLVIA will be submitted at Deadline 3.
SPS-104	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed	<p>SPS considers that East Anglia TWO will adversely affect the special qualities of the AONB and undermine the purpose of the designation. SPS agrees with the Applicants' <b>SLVIA Chapter 28</b> (APP-076) that East Anglia ONE North will have significant adverse effects only in combination with those of East Anglia TWO.</p> <p>SPS agrees with the summary of effects at <b>Table 28.11, Chapter 28</b> (APP-076) which shows that there would be significant long-term effects from multiple viewpoints.</p> <p>SPS disagrees with the Applicants' SLVIA that the construction and operation of the offshore infrastructure will not result in harm to the special qualities of the AONB in overall terms (para 340, <b>Chapter 28</b> (APP-076)).</p> <p>SPS does not agree that the impacts upon the landscape quality, big Suffolk skies, sense of remoteness, wildness and distractions from tranquillity are not significant.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>SPS disagrees that the impacts on Sizewell Beach are not significant because of the presence of Sizewell power stations reduces the sensitivity to change.</p> <p>SPS disagrees that Galloper and Greater Gabbard justifies further harm to the seascape and AONB. Even though they are closer to the shoreline (29.3km as opposed to 32.38km) they are significantly shorter turbines (180m) as opposed to (up to) 300m.</p> <p>The Applicants note that all of the above matters where agreement is outstanding may result from a difference in professional opinion. The Applicants are of the view that they have provided sufficient and adequate information within <b>Chapter 28 SLVIA</b> (APP-076) and its associated appendices of the ES (APP-556 to APP-564) to justify why such conclusions regarding the level and significance of SLVIA impact have been deduced. The Applicants are preparing a clarification note on the Statutory Purpose of the AONB which it intends to submit into the Examination at Deadline 2.</p>



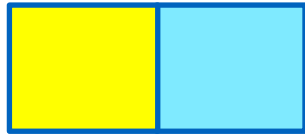
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
SPS-105	Assessment Conclusions	The potential impacts identified in the SLVIA accurately reflect the potential impacts on the receiving environment within the study area.	Agreed	Agreed	Not Applicable	SPS defer to the views of the Suffolk Coast and Heaths AONB Partnership and East Suffolk Council on this matter.  The Applicants note that this matter remains under discussion with the Councils, as well as the AONB Partnership.
SPS-106	Assessment Conclusions	The construction and operation of the East Anglia ONE North offshore infrastructure has no significant Project alone effects on landscape and visual amenity, or natural beauty/special qualities of the AONB.	Not Applicable	Agreed	Not Applicable	SPS defers to the statutory partners of the local authorities and Natural England, as well as the AONB Partnership on this statement.  The Applicants note that this statement is agreed in the SoCG with the Councils. Progress has been made with Natural England on this matter and a SoCG with Natural England in relation to SLVIA will be submitted at Deadline 3.
SPS-107	Assessment Conclusions	Within the AONB area covered by the Suffolk Heritage Coast, the spatial extent of potential significant effects of the East Anglia TWO windfarm site on views and perceived character is geographically focused along the coastal edge landscape of the	Agreed	Not Applicable	Not Applicable	SPS defers to the AONB Partnership on this statement.  The Applicants note that this matter is agreed in the SoCG with the Councils.



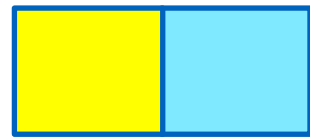
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		AONB, approximately between Covehithe in the north and Aldeburgh/Orford Ness in the south.				
SPS-108	Assessment Conclusions	Effects of the Projects' offshore infrastructure on the character and special qualities of the AONB are indirect. Due to their location at distance outside the AONB, the Projects' offshore infrastructure affects the perception of certain special qualities, relating to changes in perception of the landscape where views offshore are an aspect of the special qualities.	Agreed	Agreed	Not Agreed	<p>SPS considers that although the infrastructure is located outside the AONB, the curtaining effect of the turbines on the skyline will have a direct adverse impact on the special qualities of the AONB. Notwithstanding the revised layout of the turbines, significant adverse effects on landscape and visual receptors will occur. SPS defers to the statutory bodies' and AONB Partnership's views on this statement.</p> <p>The Applicants note that the equivalent statement within the SoCG with the Councils is agreed, although this matter remains under discussion between the Applicants and the AONB Partnership. The Applicants will continue to engage with the AONB Partnership and SPS on this matter.</p>
SPS-109	Assessment Conclusions	The effects of the East Anglia TWO windfarm site will be not significant on other AONB special qualities where the seascape	Agreed	Not Applicable	Not Agreed	SPS considers that the seascape setting materially contributes towards special qualities



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		setting is not a factor and the existing characteristics/special qualities will continue to define the character and distinctiveness of the AONB.				<p>of the AONB including relative wildness, lack of human influence and relative tranquillity.</p> <p>The Applicants disagree with SPS's position. The Applicants referenced the baseline descriptions of special qualities as identified in the Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators (SCDC 2016) as agreed with the SLVIA ETG. The relative wildness, lack of human influence and relative tranquillity special qualities make no mention of the seascape setting materially contributing towards those special qualities.</p> <p>The Applicants note that there may be a difference in the interpretation of definitions for the AONB's special qualities referred to by SPS above. This suggests that the difference in the Applicants' and SPS' position may result from a difference in professional opinion.</p>
SPS-110	Assessment Conclusions	The cumulative effects of East Anglia TWO and East Anglia ONE North have been adequately and appropriately described within the SLVIA assessment and the conclusions are appropriate.	Agreed	Agreed	Not Agreed	SPS considers that although the infrastructure is located outside the AONB, the curtaining effect of the turbines on the skyline will have a direct adverse impact on the special qualities of the AONB. SPS defers to the statutory bodies'

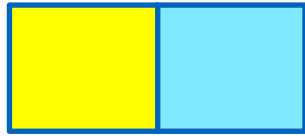


ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>and AONB Partnership's views on this statement.</p> <p>This matter remains under discussion between the Applicants and the Councils and the AONB Partnership.</p>
SPS-111	Assessment Conclusions	The cumulative effects with future projects have been adequately and appropriately described within the SLVIA assessment and the conclusions are appropriate.	Agreed	Agreed	Not Agreed	<p>SPS does not agree that the National Grid Ventures Interconnector projects (Nautilus, Eurolink, SCD1 and SCD2) should have been excluded from an assessment of cumulative impacts. SPS defer to the view of the statutory parties on this issue, including Suffolk County Council.</p> <p>A CIA has been carried out for each of the considered receptor topics in <b>Chapters 7 to 30</b> (APP 055-078) of the ES. The approach used for the CIA follows Planning Inspectorate Advice Note 17.</p> <p>Following the guidance in Advice Note 17, the abovementioned projects were not considered in the CIA because at the time the Projects' CIAs were written there was inadequate detail upon which to base any meaningful</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>assessment (with no information on, for example, the project design, and timescales).</p> <p>The abovementioned projects will require their own EIA and as part of that process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Projects in each of their respective EIAs as they progress through the planning process.</p> <p>The approach used for the Projects' CIA follows Planning Inspectorate Advice Note 17.</p>
SPS-112	Mitigation	The embedded mitigation set out within <b>Section 28.3.3</b> and <b>Section 28.3.4</b> of the ES (APP-076) is appropriate and sufficient.	Agreed	Agreed	Not Agreed	<p>SPS does not agree that all necessary mitigation measures have been proposed and raise concerns regarding the proposed height of the turbines. The Applicants have incorporated embedded mitigation into the design of the Projects (including consideration of distance from the coastline and turbine heights) and adopted good design principles during the site selection and initial design phase. Information on this is presented within <b>Chapter 4 Site Selection and Assessment of Alternatives</b> of the ES (APP-052).</p> <p>The Applicants have committed to a reduction in wind turbine tip height from the worst case</p>





ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						<p>maximum of 300m as assessed in the ES to a maximum of 282m. The commitment applies to all turbines at both Projects.</p> <p>Regarding night time aviation lighting, the Air Navigation Order (2016), which sets the requirements for aviation lighting, allows for a lighting intensity of between 200 candela (cd) to 2000cd depending on visibility conditions. The Applicants can confirm a commitment to embedded mitigation of operating the aviation lights at an lighting intensity of 200cd when visibility permits. Lighting intensity will be increased from 200cd up to a maximum of 2000cd as visibility conditions deteriorate. It is pertinent to note that the night time photomontages presented in the ES represent an unrealistic worst case in that they show 2000cd in good visibility which is a scenario that would not occur. Moreover, the photomontages presented a greater number of wind turbines hosting aviation lighting than in fact would occur. However, in the absence of finalised turbine layouts for each Project and a decision on which turbines would need to host aviation</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
						lighting, an unrealistic worst-case scenario was presented in each ES.
SPS-113	Mitigation	A reduction in the East Anglia TWO windfarm site boundary from that presented in the Preliminary Environmental Information has reduced seascape, landscape and visual effects of the East Anglia TWO windfarm site, and the cumulative effect with the East Anglia ONE North windfarm site, on the setting and key coastal viewpoints of the Area of Outstanding Natural Beauty (AONB), primarily due to the reduction in the lateral spread of the revised layout on the sea skyline, in key viewpoints from the AONB.	Agreed	Agreed	Not Agreed	<p>SPS considers that although impacts are reduced, East Anglia TWO will continue to cause a substantial curtain effect of turbines on the skyline from the AONB and will not conserve and enhance its special qualities.</p> <p>The Applicants do not agree that a curtaining effect will arise between the reduced East Anglia TWO windfarm site and the East Anglia ONE North windfarm site. The Applicants note that this matter remains under discussion with SPS.</p>
<b>Draft Development Consent Order</b>						
SPS-114	Wording of Requirement(s)	The wording of Requirement 2 provided within the <b><i>draft DCO</i></b>	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society Position	Notes
		(AAP-023) (and supporting certified documents) with reference to detailed offshore design parameters of wind turbine generators is appropriate in terms of SLVIA.				
SPS-115	Wording of Requirement(s)	The wording of Requirement 3 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to detailed offshore design parameters of offshore electrical platforms is appropriate in terms of SLVIA.	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.
Other Matters as Required						
N/A						



## 2.3 Landscape and Visual Impact Assessment

20. The onshore components of the Projects have the potential to impact upon landscape and visual amenity. **Chapter 29 Landscape and Visual Impact Assessment** of the ES (APP-077) provides an assessment of the significance of these impacts.
21. **Table 7** provides an overview of consultation undertaken with SPS regarding the LVIA. Further details on the stakeholder engagement process for consultation undertaken with SPS regarding landscape and visual effects can be found in the Consultation Report (APP-029).

**Table 7 Summary of Consultation with SPS Regarding Landscape and Visual Effects**

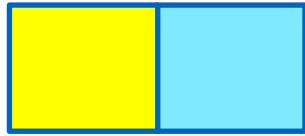
Date	Contact Type	Topic
<b>Pre-Application</b>		
20 <sup>th</sup> March 2019	Written correspondence	Feedback received via Section 42 consultation (responses to the PEIR) in relation to landscape and visual amenity matters.
<b>Post-Application</b>		
20 <sup>th</sup> January 2020	Written correspondence	Feedback received via SPS' Relevant Representation.
10 <sup>th</sup> March 2020	Written correspondence	SPS provided their initial comments on a draft template of the SoCG.
11 <sup>th</sup> June 2020	Written correspondence	SPS provided comments on a draft SoCG.
15 <sup>th</sup> October 2020	Written correspondence	SPS provided comments on a draft SoCG.

22. **Table 8** presents the matters agreed or not agreed in relation to LVIA.



Table 8 Landscape and Visual Impact Assessment

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society position	Notes
<b>Environmental Impact Assessment</b>						
SPS-201	Existing Environment	Sufficient survey data has been collected to appropriately characterise the baseline environment in terms of landscape and visual amenity and inform the assessment.	Agreed	Agreed	Not Agreed	<p>SPS deems there to be insufficient viewpoints at the onshore substations site to inform the baseline and assessment of landscape and visual impacts.</p> <p>The Applicants consider they have provided sufficient information by way of visualisations of the onshore substations within <b>Figures 29.13 to 29.26</b> of the ES (APP-404 to APP-417) to inform the baseline and facilitate a robust assessment of the landscape and visual effects. LVIA viewpoints and their locations were agreed with Suffolk County Council and East Suffolk Council through the LVIA ETG.</p> <p>SPS does not agree that the site selection, siting and micrositing for the onshore substations is consistent with the principles of Good Design set out within NPS for Energy (EN1), emphasising the importance of good design including siting and sensitivity to place to minimise the harmful impacts of energy infrastructure on the landscape.</p> <p>As part of the optioneering process, the Applicants consider that they have undertaken</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society position	Notes
						<p>a robust site selection and assessment of alternatives (see <b>Chapter 4 Site Selection and Assessment of Alternatives</b> of the ES (APP-052)), which takes into consideration all factors when selecting a site for the Projects' onshore substations.</p> <p>SPS considers that the red, amber, green (RAG) assessment is not an instrument on which to base this fundamental decision and fails to understand how the Friston site has been assessed low for both landscape character sensitivity and visual sensitivity in the RAG analysis.</p> <p>The Applicants believe the approach to assessing the prospective sites for the Projects' substations set out within <b>Chapter 4</b> of the ES (APP-052) is robust and consistent with the assessment approach adopted for other similar developments. Extensive pre-application consultation on the site selection process was undertaken during which SPS were given the opportunity to provide feedback through Phase 2, Phase 3 and Phase 3.5 of the pre-application consultation process. As discussed in <b>Chapter 4</b>, RAG is a standard assessment tool used in</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society position	Notes
						the pre-EIA process. <b>Section 4.9.1.3</b> (APP-052) explains how the RAG assessment did not identify the chosen onshore substation site, rather it was a tool that allowed a number of sites to be compared and the most acceptable sites identified at the time to progress to further assessment stages.
SPS-202	Assessment Methodology	The impact assessment methodologies used for the LVIA provide an appropriate approach to assessing potential impacts of the Project.	Agreed	Agreed	Not Applicable	SPS defers to the statutory bodies of Natural England and the local authorities on this statement.  The Applicants note that this statement is agreed with the Councils and considered closed within the SoCG with Natural England.
SPS-203	Assessment Methodology	The worst case scenario in terms of design parameters and visibility presented in the LVIA is appropriate.	Agreed	Agreed	Not Applicable	SPS defers to the statutory bodies of Natural England and the local authorities on this statement.  The Applicants note that this statement is agreed with the Councils and considered closed within the SoCG with Natural England.
SPS-204	Assessment Methodology	The study area defined for the LVIA is appropriate for the impacts considered.	Agreed	Agreed	Not Applicable	SPS defers to the statutory bodies of Natural England and the local authorities on this statement.

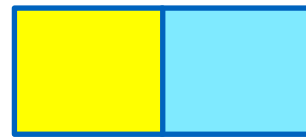


ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society position	Notes
						The Applicants note that this statement is agreed with the Councils and considered closed within the SoCG with Natural England.
SPS-205	Assessment Methodology	The photomontages produced for the LVIA meet appropriate standards and are suitable to inform judgements on visual impact of the onshore infrastructure, while recognising that all photomontages have limitations (as set out in <b>Section 6.3.29.2, Appendix 29.2 LVIA Methodology</b> (APP-566)).	Agreed	Agreed	Not Agreed	<p>SPS considers that there is a lack of information contained within <b>Chapter 29</b> (APP-077). For example on <b>Figure 29.9</b> (APP-399) only viewpoints 3 and 5 are helpful in illustrating the impacts from the north of the substations with no views from the PRoW towards Friston village. The photomontages do not identify the cable sealing end compounds as they are not labelled at all. There is also no visualisation of the access road.</p> <p>The Applicants have reviewed <b>Figure 29.9</b> of the ES (APP-399) and identified four viewpoints (3, 5, 10 and 11) and two illustrative viewpoints (D and F) north of the substations. The Applicants disagree with SPS' assertion that no photomontages have been provided of the cable sealing end compounds. Viewpoint 5 (APP-408) and viewpoint 10 (APP-413) provide visualisations of the cable sealing end compounds from the north, viewpoint 3 (APP-406) and viewpoint 11 (APP-414) provide visualisations of the cable sealing end</p>





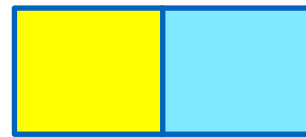
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society position	Notes
						<p>compounds from the northeast and viewpoint 8 (APP-411) provides a visualisation of the cable sealing end compounds from the west.</p> <p>The Applicants note that a visualisation has not been provided showing views of the access road to the substations site leading from the B1121. This was not requested at the time the viewpoint locations were agreed with the ETG.</p> <p>The Applicants note a visualisation has not been provided showing views from the PRoW towards Friston Church. This was not requested at the time the viewpoint locations were agreed with the ETG. It is the Applicants' position that visualisations for the landscape, visual and impact assessment represent the views of the onshore infrastructure experienced by sensitive receptors and this is a distinctly different assessment to the assessment of setting of cultural heritage assets (presented within <b>Appendix 24.7</b> of the ES (APP-519) which included visualisations appropriate for that assessment).</p> <p>For the LVIA, the Applicants believe they have provided sufficient coverage and number of visualisations to represent views experienced</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society position	Notes
						by sensitive receptors. LVIA viewpoints and their locations were agreed with Suffolk County Council and East Suffolk Council through the LVIA ETG process. Therefore, the Applicants believe they are robust.
SPS-206	Assessment Methodology	The with mitigation photomontages produced for the LVIA have been informed by appropriate vegetation growth rates, in line with accepted guidance (as referred to within <b>Section 29.3.3.1</b> of the ES (APP-077)).	Agreed	Agreed	Not Agreed	SPS considers that the visualisations of the proposed mitigation at 15 years indicate an over-optimistic growth rate. However, SPS defers to the statutory bodies, Natural England and the local authorities on this issue.  The Applicants consider that the growth rates and predicted height of planting presented within the assessment are robust, having used industry guidance to inform the growth rates of the proposed planting as described in <b>section 29.2.7.3, Appendix 29.2</b> of the ES (APP-566). It is noted that this matter remains under discussion between the Applicants and the Councils.
SPS-207	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are	Agreed	Agreed	Not Applicable	SPS defers to the statutory bodies of Natural England and the local authorities on this statement.



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		consistent with the agreed assessment methodologies.				The Applicants note that this statement is agreed with the Councils and considered closed within the SoCG with Natural England.
SPS-208	Assessment Conclusions	The potential impacts of the landfall and onshore cable route identified in the LVIA are accurate for the relevant receptors.	Agreed	Agreed	Not Applicable	SPS defers to the statutory bodies of Natural England and the local authorities on this statement.  The Applicants note that this statement is agreed with the Councils and considered closed within the SoCG with Natural England.
SPS-209	Assessment Conclusions	The potential impacts of the onshore substations identified in the LVIA are accurate for the relevant receptors.	Agreed	Agreed	Not Agreed	SPS agrees with the ES ( <b>Chapter 29</b> summary para 254 (APP-077)) assessment that landscape and visual effects on the Friston area will be significant, long term and permanent. However, SPS considers that the applicant has not understood the effects and does not truly reflect the character or the historic significance of the landscape and the harm that will result. SPS considers that such a large alien feature will not integrate with this existing landscape but will dominate in terms of siting, scale and massing.



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						<p>SPS considers that the infrastructure would cause severe landscape harm that cannot be mitigated. This includes harm to:</p> <ul style="list-style-type: none"> <li>• The character of the countryside;</li> <li>• The character of Friston village;</li> <li>• The PRoW network;</li> <li>• Landscape fabric; and</li> <li>• Receptors within the Hundred River Valley Special Landscape Area.</li> </ul> <p>SPS consider that the ES underestimates the level of visual impact. SPS does not agree that the visual effects of the substations will be not significant at 15 years.</p> <p>The Applicants emphasise their position is that the LVIA represents a distinctly different assessment to the assessment of setting of cultural heritage assets (which is presented in <b>Appendix 24.7</b> of the ES (APP-519)). The Applicants maintain that the characterisation of the baseline landscape and the conclusions of the impact assessment presented within</p>



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						<p><b>Chapter 29</b> (APP-077), <b>Appendix 29.3</b> (APP-567) and <b>Appendix 29.4</b> (APP-568) are robust.</p> <p>SPS consider there is insufficient detail regarding the landscape and visual impacts of significant infrastructure components such as introduction of the proposed 1.7km permanent access road into the landscape.</p> <p>The permanent operational substation access road is at ground level and therefore the Applicants believe this is not a visual component of the Projects.</p>
SPS-210	Assessment Conclusions	The East Anglia ONE North, East Anglia TWO and National Grid substations have no significant effects on the natural beauty/special qualities of the AONB.	Agreed	Agreed	Agreed	None
SPS-211	Assessment Conclusions	Significant effects on AONB special qualities are limited to the temporary construction activities associated with the onshore cable route and landfall, occurring within or close to Section 1 of the	Agreed	Agreed	Not Applicable	<p>SPS defer to the statutory bodies and the AONB Partnership on the level of significance.</p> <p>The Applicants note that this statement is agreed with the AONB Partnership and with the Councils.</p>



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		onshore development area ( <b>Figure 6.2a</b> of the ES (APP-097)).				
SPS-212	Assessment Conclusions	Landscape and visual effects associated with the onshore cable route are considered temporary and will be reinstated, with no significant long-term operational effects on AONB natural beauty/special qualities arising.	Agreed	Agreed	Not Applicable	SPS defer to the statutory bodies and the AONB Partnership on the level of significance of the impact on the AONB.  The Applicants note that this statement is agreed with the AONB Partnership and with the Councils
SPS-213	Assessment Conclusions	The cumulative impacts of East Anglia TWO and East Anglia ONE North have been adequately and appropriately described within the LVIA assessment and the conclusions are appropriate.	Agreed	Agreed	Not Agreed	SPS considers that the landscape and visual impacts of East Anglia ONE North, East Anglia TWO and National Grid substations on the historic landscape character of Friston and the wider landscape have been underestimated. SPS considers that the cumulative footprint of these industrial scale intrusions will exceed that of the small rural village.  The Applicants do not consider that landscape and visual effects of the Projects upon the historic landscape character of Friston and the wider landscape have been underestimated and have provided further clarification on



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						historic landscape character within the <b>Archaeology and Cultural Heritage Clarification Note</b> submitted into the Examination at Deadline 1 (document reference ExA.AS-10.D1.V1).
SPS-214	Assessment Conclusions	The cumulative impacts with future projects have been adequately and appropriately described within the LVIA assessment and the conclusions are appropriate.	Agreed	Agreed	Not Agreed	<p>SPS does not agree that the National Grid Ventures Interconnector projects (Nautilus, Eurolink, SCD1 and SCD2) should have been excluded from an assessment of cumulative impacts.</p> <p>A CIA has been carried out for each of the considered receptor topics in <b>chapters 7 to 30</b> (APP 055-078) of the ES. The approach used for the CIA follows Planning Inspectorate Advice Note 17.</p> <p>Following the guidance in Advice Note 17, the abovementioned projects were not considered in the CIA because at the time the Projects' CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales).</p> <p>The abovementioned projects will require their own EIA and as part of that process will need to</p>

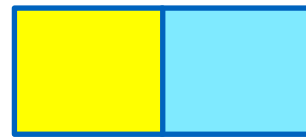


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						<p>undertake a cumulative assessment. Each of the above projects will therefore consider the Projects in each of their respective EIAs as they progress through the planning process.</p> <p>The approach used for the Projects' CIA follows Planning Inspectorate Advice Note 17.</p>
SPS-215	Mitigation	The undergrounding of the onshore cabling in its entirety provides appropriate mitigation of potential landscape and visual effects.	Agreed	Agreed	Not Applicable	<p>SPS defer to the statutory bodies on the level of significance of the impact.</p> <p>Potential impacts associated with loss of woodland due to the onshore cable route is discussed in <b>section 22.6.1.4</b> in <b>Chapter 22 Onshore Ecology</b> (APP-070). The Applicants note that none of the locations of woodland loss identified are within the Suffolk Coast and Heaths AONB and therefore are not associated with long term effects on the AONB landscape.</p> <p>SPS considers that in order to inform any mitigation strategy, the landscape impacts of the loss of trees should also be covered in <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077).</p> <p>The Applicants note that loss of woodland at the Aldeburgh Road crossing was considered</p>





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						<p>as an operation phase effect, as agreed with the LVIA ETG (see <b>paragraph 11, Chapter 29</b> (APP-077)). An assessment of landscape and visual effects which takes account of the woodland loss at Aldeburgh Road is presented within <b>section 29.6.2.1, Chapter 29</b> (APP-077) and is considered robust by the Applicants. The other two areas of woodland lost at Laurel Covert and the A1094 / B1069 junction (0.1ha each) were scoped out of further assessment.</p> <p>The Applicants note that this statement has been agreed in SoCGs with Natural England, as well as the Councils.</p>
SPS-216	Mitigation	The Applicants have proposed appropriate reinstatement proposals to facilitate restoration of hedgerows and hedgerow trees within the onshore cable route.	Agreed	Agreed	Not Applicable	<p>SPS defer to the statutory body of SCC on this matter.</p> <p>Potential impacts associated with loss of woodland due to the onshore cable route is discussed in <b>section 22.6.1.4 in Chapter 22 Onshore Ecology</b> (APP-070). The Applicants note that none of the locations identified are within the Suffolk Coast and Heaths AONB and therefore are not associated with long term effects on the AONB landscape.</p>



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						<p>SPS considers that in order to inform any mitigation strategy, the landscape impacts of the loss of trees should also be covered in <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077).</p> <p>The Applicants note that loss of woodland at the Aldeburgh Road crossing was considered as an operation phase effect, as agreed with the LVIA ETG (see <b>paragraph 11, Chapter 29</b> (APP-077)). An assessment of landscape and visual effects which takes account of the woodland loss at Aldeburgh Road is presented within <b>section 29.6.2.1, Chapter 29</b> (APP-077) and is considered robust by the Applicants. The other two areas of woodland lost at Laurel Covert and the A1094 / B1069 junction (0.1ha each) were scoped out of further assessment.</p> <p>The Applicants note that this statement has been agreed in the SoCG with the Councils but remains under discussion with Natural England.</p>
SPS-217	Mitigation	The Applicants have proposed all reasonable mitigation measures to minimise the landscape and	Agreed	Agreed	Not Agreed	SPS are of the position that the site selection, siting and micro-siting of the onshore substations at Friston results in LVIA impacts which cannot be effectively mitigated.



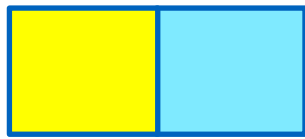
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Suffolk Preservation Society position	Notes
		visual effects of the permanent onshore substations.				<p>As part of the optioneering process, the Applicants consider that they have undertaken a robust site selection and assessment of alternatives (see <b>Chapter 4 Site Selection and Assessment of Alternatives</b> of the ES (APP-052)), which took into consideration landscape and visual factors when selecting a site for each Project's onshore substation. The site selection process also considered the ability of the landscape to accommodate the onshore substations.</p> <p>Extensive landscaping is proposed within the <b>Outline Landscape Mitigation Plan</b>, illustrated in <b>Figure 29.11a – 29.11b</b> of the ES (APP-401 to APP-402) and described in <b>section 3</b> of the <b>OLEMS</b> (APP-584). The Applicants will prepare a Landscape Management Plan setting out the measures for the management and maintenance of landscaping, which will be approved by the relevant planning authority under Requirement 14 of the <b>draft DCO</b> (APP-023). The implementation of the Landscape Management Plan is secured by Requirement 15 of the <b>draft DCO</b> (APP-023).</p>



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						<p>SPS does not agree that LVIA impacts will be not significant after 15 years post-planting and raise concerns in relation to the permanent LVIA impacts of the overhead lines, sealing end compounds and access road. It is SPS's view that the proposed mitigation planting in itself will impact the character of the existing countryside.</p> <p>The Applicants are confident that as the landscaping scheme and associated planting establishes, the significance of unmitigated visual impacts assessed within <b>Chapter 29 Landscape and Visual Impact Assessment</b> of the ES (APP-077) will reduce to the post-mitigation (residual) impacts assessed.</p> <p>The Applicants would also emphasise that the assessment of landscape and visual effects is separate to the assessment of setting of onshore heritage assets, which is presented within <b>Chapter 24 Archaeology and Cultural Heritage</b> of the ES (APP-072).</p>
Draft Development Consent Order						



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SPS-218	Wording of Requirement(s)	The wording of Requirement 14 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a Landscape Management Plan for the mitigation and monitoring of potential effects on landscape and visual amenity is appropriate and adequate.	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.
SPS-219	Wording of Requirement(s)	The wording of Requirement 15 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to implementation and maintenance of landscaping for the mitigation and monitoring of potential effects on landscape and visual amenity is appropriate and adequate.	Agreed	Agreed	No Comment	SPS does not wish to comment on the wording of the DCO.
<b>Other Matters as Required</b>						
N/A						



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### 3 Signatures

23. The above Statement of Common Ground is agreed between East Anglia TWO Limited, East Anglia ONE North Limited and Suffolk Preservation Society on the day specified below.

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **Suffolk Preservation Society**

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Anglia TWO Limited**

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Anglia ONE North Limited**