



National Infrastructure Planning
Temple Quay House
2 The Square
Bristol,
BS1 6PN

Date: 2 November 2020
Your Reference: EN010077 & EN01078
Our Ref: EA1N – 20023870/EA2 - 20023871
Enquiries to: Naomi Gould

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EastAngliaOneNorth@planninginspectorate.gov.uk
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Dear Rynd Smith,

DEADLINE 1 OF EAST ANGLIA ONE NORTH (EA1N – EN010077) AND EAST ANGLIA TWO (EA2 – EN010078) DCO EXAMINATIONS

This letter is provided in response to Deadline 1 of the EA1N and EA2 examinations and the items identified within the examination timetable provided in the Rule 8 letters.

Post Hearing Submission – Appendix A

East Suffolk Council welcomed the opportunity to speak during the second Open Floor Hearing held on 8 October 2020. A transcript of the oral case put forward by Councillor Craig Rivett on behalf of the local authority has been provided in Appendix A.

It is understood that each Interested Party will only be given one opportunity to participate in an Open Floor Hearing session during the examination unless there are extenuating circumstances. We recognise that we have utilised this opportunity and therefore will not be requesting to be heard for a second time.

Further Issue Specific Hearing Notification

East Suffolk Council would like to confirm that we would like to speak at Issue Specific Hearings 1 and 2 which are scheduled to be held over 1, 2 and 3 December 2020. We would also like to confirm our wish to be heard at all subsequent Issue Specific Hearings to be scheduled, including the ones identified in the timetable for the weeks commencing 18 January, 25 January and 8 March 2021.

Site Visits and notification of wish to attend any site visit – Appendix B

The four site visits already undertaken by the Examining Authority and the details published on the EA1N and EA2 project pages of the National Infrastructure Planning website have been noted. A list of suggested site visit locations has been identified and provided in Appendix B. It is recognised that the list provided duplicates some of the locations already visited by the Examining Authority. We however wanted to provide a comprehensive list in addition to our reasoning for the locations specified. It may be that this information can be utilised to determine whether a further visit is necessary or to reflect on a visit already undertaken.

East Suffolk Council would like to take the opportunity to confirm that we would like to attend any accompanied site visits.

Electronic Correspondence

We can confirm that we are happy to receive all correspondence in relation to the examinations in electronic form. Please can this be sent to the Council's Energy Projects Team's generic e-mail address energyprojects@eastsuffolk.gov.uk in addition to Naomi Gould naomi.gould@eastsuffolk.gov.uk.

Summary of Relevant Representation – Appendix C

We have provided a summary of our Relevant Representation as we recognise that this document exceeded the set 1500-word limit. The summary has been provided in Appendix C.

Comments on other Relevant Representations

East Suffolk Council provided a joint submission with Suffolk County Council to the Examining Authority setting out our comments on the submitted Relevant Representations. The document was submitted to both examinations on 10 June 2020 and has been published on the project webpages. We have no further submissions to make in relation to the submitted Relevant Representations.

Local Impact Report

East Suffolk Council and Suffolk County Council have prepared a joint Local Impact Report, this has been provided separately. The LIR provides full details the impacts of the projects, by virtue of its comprehensive nature we will not be providing a Written Representation in addition to this document.

Examining Authorities Questions 1 Published 12 October 2020 – Appendix D

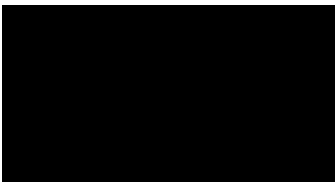
We have provided our responses to the questions set by the Examining Authority on the 12 October within Appendix D. We have provided these in the same tabular form which they were provided for ease of reading. The responses have been prepared jointly with Suffolk County Council, but we have identified which Council has led on the response for clarity and to reduce the degree of duplication.

Statements of Common Ground

We have been working with the Applicants to prepare initial Statements of Common Ground in relation to a number of matters. It is understood that the Statements of Common Ground will be submitted to the Examining Authority by the Applicants and therefore we have not sought to provide them as well.

If you have any questions regarding the Council's submission, please do not hesitate to contact us.

Yours sincerely,



Philip Ridley BSc (Hons) MRTPI
Head of Planning and Coastal Management
East Suffolk Council

Appendices:

Appendix A – Transcript of East Suffolk Council's oral submission at the Open Floor Hearing held on 8 October 2020

Appendix B – Suggested site visit locations

Appendix C – Summary of East Suffolk Council's Relevant Representation

Appendix D – East Suffolk Council's and Suffolk County Council's joint responses to the Examining Authorities questions set 12 October 2020.

Appendix A - Transcript of East Suffolk Council's oral submission at the Open Floor Hearing held on 8 October 2020

We would like to thank the Examining Authority for the opportunity to speak and for the opportunity provided to local residents to express their views. The comments of the Examining Authority during the Preliminary Meeting have been noted and therefore I will try and be as concise as possible.

East Suffolk Council recognises the role offshore wind and other low carbon energy sources are set to play in helping the UK to achieve a carbon neutral economy by 2050.

We support this ambition and fully recognise the contribution East Suffolk will make by virtue of its geographical proximity to advantageous offshore seabed conditions, and strategic onshore electrical infrastructure.

We are currently facing uncertain times and it is recognised that offshore wind development can contribute to the post-Covid 19 economic recovery both locally and nationally. The offshore wind industry provides a big opportunity for Lowestoft in terms of job creation and inward investment, which has been seen with the construction of the East Anglia One Operations and Maintenance base in the town.

However, these benefits do not mean that the offshore wind industry should be supported at any cost. At present there is a worrying lack of coordination between the major infrastructure projects in the area which is a fundamental concern of the District Council. We have been working with Suffolk County Council to strive for a more coordinated approach to major energy infrastructure. The current un-coordinated and piecemeal approach taken by developers, results in significant and unnecessary impacts on local communities and the environment which could be avoided or reduced.

The current projects are unfortunately an example of this. It is welcomed that the same onshore order limits are proposed for both projects, and that the onshore infrastructure will be co-located. However, it is disappointing that the applicants cannot consolidate the onshore development by sharing infrastructure, committing to the simultaneous construction of the projects, or if constructed sequentially, committing to one project laying the ducting for the second. These measures would all help to reduce the environmental impacts of the projects which will inevitably be to the detriment of the local community. We understand that greater coordination would be possible. As an example, the consented East Anglia One project promoted by ScottishPower Renewables provided the ducting for the later East Anglia Three project. It is not clear why similar coordination could not be achieved in this case.

Another major concern for East Suffolk Council is the lack of coordination in relation to the grid connections process. We understand that the grid connection regime may be outside the scope of this examination, but the lack of coordination in that process results in consequences and impacts which are within scope of the examination. The National Grid substation which is proposed under the current Development Consent Order applications, is also identified as the point of connection for a further three other projects:

- *Nautilus Interconnector*
- *Eurolink Interconnector*

- Galloper Extension now known as Five Estuaries Wind Farm.

This means that the National Grid substation proposed by these applications will need to be enlarged to accommodate these further connections, and there will be further substations in the vicinity of Friston associated with these other projects. However, the East Anglia One North and East Anglia Two applications do not consider those future projects and therefore the full impacts of the construction of the National Grid substation at Friston, which we know would need to be extended, have not been explained to the Examining Authority.

The development of the substations will result in long lasting impacts on the landscape character and views surrounding the site and village of Friston, where the substations are located. The village benefits from several heritage assets and historic features, including a public right of way along a former hundred boundary, which contribute its historic landscape character and sense of place. Many features and assets will unfortunately be adversely affected or lost. East Suffolk Council consider that the examination into East Anglia One North and East Anglia Two should take into account the likely effects arising from these projects and others in the pipeline that will inevitably add to or exacerbate the impacts at Friston. In addition to visual concerns, the effect of the long-term operational noise is a key concern for the local authority.

Friston is a small rural village it is important not to underestimate the impact the development of these projects will have on the local community.

The offshore impacts should not be forgotten with the applications resulting in significant long-term impacts on the special qualities of the Area of Outstanding Natural Beauty.

East Suffolk Council has set out its current position in relation to the East Anglia One North and East Anglia Two applications in their Relevant Representation.

We have identified our support for the principle of offshore wind but made it clear that this must not be at any cost.

There is insufficient time available today to go through matters in detail and highlight every aspect of the applications where we have raised concerns. This is the purpose of the Issue Specific Hearings and our Local Impact Report. We have been working closely with Suffolk County Council and therefore to avoid repetition I will leave traffic and transport, public rights of way, drainage and archaeological matters to the County to discuss.

At present, our position remains as set out in the Council's Relevant Representation: we object to the overall impact of the onshore substations and raise significant concerns regarding the effects of the offshore turbines on the Area of Outstanding Natural Beauty.

Our role in this examination is to raise our concerns with the Examining authority and to seek to protect the interests of the local community, rather than to determine the applications. We recognise that the Secretary of State is the decision-maker. In the event that consent is granted we want to ensure there are sufficient commitments secured within the Development Consent Orders, to ensure the applicants strive to reduce the impacts of the projects post consent through design refinement

works. If approved with a worst-case Rochdale envelope, the applicants should commit to trying to achieve the best case, particularly in terms of the scale and noise output from the substations.

We will however continue to work with the applicants in order to try and secure appropriate mitigation in relation to the impacts of the projects, whilst recognising in some circumstances this may not be possible, and therefore appropriate compensation is being sought.

Appendix B – Suggest Site Visit Locations

The table below provides a list of suggested site visit locations. It is recognised that the Examining Authority has already visited a number of these locations, but it was felt that it would be useful to provide a comprehensive list. The Examining Authority can review the reasoning for the site visit location suggested and determine whether there is a need to re-visit this location or use this information to reflect on the visit already undertaken.

No.	Location	Type	Application	Reasons
1	Viewpoint 3 - Covehithe	Unaccompanied	EA2 and EA1N	Selected viewpoint from SLVIA impacts on AONB
2	Viewpoint 4 - Southwold	Unaccompanied	EA2 and EA1N	Selected viewpoint from SLVIA impacts on AONB
3	Viewpoint 5 - Gun Hill, Southwold	Unaccompanied	EA1N and EA2	Selected viewpoint from SLVIA, impacts on Conservation Area.
4	Viewpoint 7 - Dunwich	Unaccompanied	EA2	Selected viewpoint from SLVIA impacts on AONB
5	Viewpoint 8 - Dunwich Heath and Beach	Unaccompanied	EA2	Selected viewpoint from SLVIA impacts on AONB
6	Viewpoint 9 - Minsmere Nature Reserve	Unaccompanied	EA2	Selected viewpoint from SLVIA impacts on AONB
7	Viewpoint 10 - Sizewell Beach	Unaccompanied	EA2	Selected viewpoint from SLVIA impacts on AONB
8	Viewpoint 12 - Thorpeness	Unaccompanied	EA2	Selected viewpoint from SLVIA impacts on AONB
9	Viewpoint 13 - Aldeburgh	Unaccompanied	EA2	Selected viewpoint from SLVIA impacts on AONB
10	Viewpoint 18 - Orfordness (Lighthouse)	Accompanied – private land	EA2	Selected viewpoint from SLVIA impacts on AONB
11	SLVIA Viewpoints in Southwold – Area A	Unaccompanied	EA2	Selected viewpoints from SLVIA impacts on AONB – settlements, considering impacts on landscape and historic environment (see Paragraph 12.13 in LIR)

12	SLVIA Viewpoints in Aldeburgh – Areas A and B	Unaccompanied	EA2	Selected viewpoints from SLVIA impacts on AONB – settlements, considering impacts on landscape and historic environment (see Paragraph 12.13 in LIR)
13	Landfall Site	Unaccompanied	EA1N and EA2	To view landfall, Thorpeness Common, coastal cliffs and public rights of ways (Sandlings Walk and Suffolk Coast Path). To understand the interaction of the landfall site with publicly accessible areas.
14	White Cottages, Sizewell, IP16 4TY - properties south of Sizewell Common – adjacent to Work Number 9.	Accompanied – there are no public rights of way to utilise.	EA1N and EA2	To view proximity of Onshore Order Limits and construction activities to the residential properties.
15	SPA Crossing and areas of land to the east and west which could potentially be utilised for Horizontal Directional Drilling (HDD) infrastructure and Construction Consolidation Sites (CCS) – Work Numbers 11, to 13. Access to location using public rights of ways 28, 26, 23 and 24.	Unaccompanied – there is a network public right of ways which provide access to the areas.	EA1N and EA2	To view Special Protection Area crossing and adjacent land to understand the nature and use of the land currently and consider the impacts of the different crossing techniques. Also, to consider the proximity of residential properties and the land required to accommodate HDD infrastructure and CCS.
16	Aldringham Hundred River Crossing including woodland to be lost and Aldringham Court – Work Numbers 19 to 24. Access to location using public rights of way/highway - 65, B1122, 7, 30, 8, 31 and 9.	Unaccompanied – there is a network of public rights of way which provide access to the areas.	EA1N and EA2	To view pinch point in Onshore Order Limits, areas of woodland to be lost and proximity of residential properties to construction activities and setting of Aldringham Court to allow consideration of impacts on landscape and visual amenity, ecology, heritage and residential amenity.
17	Substations site – Walk around the substations site using Public Rights of Way 23, 7, 6, 8 and returning to the village centre along Grove Road and Church Road	Unaccompanied - there is a network of public rights of way which	EA1N and EA2	To view the landscape character and visual amenity including historic landscape character – see LIR Section 15 and Appendix 1 of the LIR for further details. Key views of

	(Viewpoints 2, 3, 14 and 4). Then walk around the site using Public Rights of Way 17, 20, 6 and 7 (Viewpoints 5, 1 and 2).	provide access to the areas.		the church, relationship of the Hundred/historic parish boundary to the church, Little Moor Farm and surrounding landscape. Consider the proximity of residential properties and setting of heritage assets.
18	Friston – Viewpoints 8 and 9 B1122	Unaccompanied – public highway	EA1N and EA2	To consider the impacts on landscape character and visual amenity – selected viewpoints from the LVIA.
19	Friston - High House Farm	Accompanied – require permission from the owner.	EA1N and EA2	To consider the impacts on the setting of the heritage asset – see Section 12 of the LIR.
20	Friston - Woodside Farm	Accompanied - require permission from the owner.	EA1N and EA2	To consider the impacts on the setting of the heritage asset – see Section 12 of the LIR.
21	Friston – Little Moor Farm	Accompanied - require permission from the owner.	EA1N and EA2	To consider the impacts on the setting of the heritage asset – see Section 12 of the LIR.
22	Friston - St Mary’s Church	Accompanied - require permission from the owner.	EA1N and EA2	To consider the impacts on the setting of the heritage asset – see Section 12 of the LIR.

Appendix C – Summary of East Suffolk Council’s Relevant Representation

Areas where the Council has significant concerns and where the issues remain unresolved:

- Landscape and Visual Effects – Visualisations and effectiveness of the proposed mitigation planting due to the assumed growth rates, the understanding of the historic landscape character and the exploration of opportunities to minimise impacts of substations.
- Noise and Vibration – Adequacy of the noise assessment and impacts.
- Design and Masterplan – Future expansion of the and site insufficient commitment within the Development Consent Orders (DCO) to secure the minimisation of the scale and impacts of the substations.
- Substations – Impacts of the onshore substations associated with projects and adequacy of the mitigation proposals.
- Traffic and Transport - Impacts of the proposals alone and cumulatively with other projects including concerns in relation to the A12/A1094 junction.
- Seascape and Visual Effects –Adverse impacts of the turbines on the character and special qualities of the Area of Outstanding Natural Beauty (AONB) and adequacy of mitigation.
- Cumulative Impacts – Lack of assessment of the full cumulative impacts of the existing and potential future projects in East Suffolk.
- Mitigation and Compensation – Insufficient mitigation/compensation proposed to address the residual impacts of the projects.

East Suffolk Council (ESC) also has concerns or would wish to make representations in several additional areas:

- Socio-Economic –Creation of a new Memorandum of Understanding which provides a platform to maximise the education, skills and economic benefits is welcome. Concerns regarding the cumulative impacts with Sizewell C and impacts on tourism.
- Heritage – Level of harm on the settings of some listed buildings and limited assessment of loss of the historic parish/Hundred boundary between Friston and Knodishall.
- Air Quality –Impacts of the projects on air quality and cumulatively with Sizewell C DCO particularly in relation to the Stratford St Andrew Air Quality Management Area.
- Public Rights of Way – Impacts on the amenity and the quality of the user experience of the public rights of way network has not been adequately addressed.
- Flood Risk – Interaction with existing drainage patterns.
- Ecology – Assessment and mitigation/compensation measures identified for some ecological receptors and lack of commitment to biodiversity net gain.
- Coastal Change – Impacts on local cliff stability and sub-sea crag outcrop.
- Archaeology – Level of detail required and deliverability of the projects within their Order Limits.
- Land Use – Loss of an area of the best and most versatile agricultural land.

- Construction Management – Management and coordination of construction works to minimise disruption and impacts.
- Major Accidents and Disaster Assessment – Assessment of onshore construction activity and impact on pre-existing emergency response arrangements.
- DCOs – Amendments required.

ESC is supportive of the principle of offshore wind development, recognising the strategic need for zero carbon energy and the contribution the industry can make to sustainable economic growth in Suffolk. This must however be achieved without significant damage to the environment, local communities, and tourist economy of East Suffolk. The projects as designed to date will result in significant impacts, particularly in relation to the environment around the substation site and significant effects on the designated landscape. Based on the current submissions, ESC objects to the overall impact of the onshore substations and raises significant concerns regarding the significant effects predicted from the offshore turbines on the AONB.

The Council will seek to engage with the Applicants in relation to the concerns outlined above to minimise the harm caused by the projects and address the issues raised where possible. The Council will also seek to secure appropriate mitigation/compensation for the identified impacts.

**Appendix D – East Suffolk Council’s responses to the Examining Authorities questions set 12
October 2020.**

The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 1 - 2 November 2020

East Suffolk Council's and Suffolk County Council's Response to Examining Authority's
First Round of Written Questions

ExQs 1	Question to:	Question:	1	2	East Suffolk Council's (ESC) and Suffolk County Council's (SCC) Response
1	Overarching, General, and Cross Topic Questions				
1.0.3	Applicants, ESC, SCC, Historic England (HE), Natural England (NE), AONB Board, Parish Councils (PCs), SASES, SEAS, SoS	<p>Design Mitigation: Adverse effects</p> <p>Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape, public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required</p>	1	2	<p><i>ESC & SCC Joint Lead</i></p> <p>Discussions with the Applicants regarding further appropriate mitigation/compensation measures are currently taking place.</p> <p>a) Adequacy of Mitigation</p> <p><i>ESC Landscape and Visual Amenity</i> - Section 6.7 identifies that external lighting will be controlled through Requirement 22 and the Code of Construction Practice (CoCP) and Requirement 25 which controls operational lighting. The Councils accept that external lighting is suitably controlled by these requirements.</p> <p>Section 6.7 also commits to the provision of effective, appropriate and suitable landscape screening and planting secured, implemented and managed through Requirement 14. The Councils welcome the commitment to this planting detailed in the Outline Landscape and Ecological Management Strategy (OLEMS) and Outline Landscape Mitigation Plan (OLMP) and secured by Requirement 14, however the growth rates proposed and the contention that the planting will be approaching maturity and provide effective mitigation after 15 years is not agreed. The Landscape and Visual Impact Assessments (LVIA) identify significant residual impacts on landscape character and visual amenity.</p> <p><i>ESC Built Heritage</i> - The operational mitigation identified in section 6.7 in relation to built heritage is the mitigation planting detailed in the OLEMS and OLMP. The Councils consider that the</p>

				<p>proposed mitigation planting will not mitigate the harm identified by locating the substations in the setting of High House Farm, Little Moor Farm, Woodside Farm and the Church of St Mary. The harm is caused by the destruction of the open, agricultural landscape within which these buildings have always been situated and through interference with/obstruction of views of the church. While some historic field boundaries are proposed to be reinstated to the south of the site the large areas of woodland have no historic precedent and merely have the effect of further severing the relationship between these historic assets and their open agricultural setting. Some changes have been made to the landscape mitigation plan to reduce further impact on the setting of the listed buildings which are welcomed, however this has reduced the impact from the mitigation itself rather than the impacts of the substations.</p> <p><i>Historic Landscape Character at the Substation Site -</i> The Applicants have not fully understood the character and significance of some of the historic features and landscape elements of the Friston site. For further information please see the Local Impact Report (LIR) and Appendix 1 of the LIR. The projects would result in the loss of extant historic landscape features of local and regional importance including the historic parish/Hundred boundary (see Councils response to Question 1.8.13). The Councils understand the Applicants will be providing a clarification note in relation to this matter. The mitigation provided within the Development Consent Orders (DCO) is not sufficient in relation to the impact on the historic landscape features.</p> <p><i>SCC Archaeology -</i> For below ground archaeology, the mitigation proposed with the exception of the Hundred boundary is</p>
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				<p>considered reasonable and this has been noted in the LIR. The Councils are engaging with the Applicants regarding appropriate compensation for the loss of the Hundred boundary.</p> <p><i>SCC Public Rights of Way (PRoW)</i> - There are no specific measures set out in section 6.7 relating to PRoWs. This is an unsatisfactory omission which the Councils believe is the result of the flawed approach taken by the Applicants to assessing the impact of the development on the rights of way network.</p> <p>The Environmental Statements (ES) do not consider the impact on the amenity value and the quality of the experience of the public using the rights of way in the vicinity of the substation site. ES Chapter 30 gives a list of PRoWs but no description of these assets. The impact methodology considers each PRoW individually using the same criteria as for holiday accommodation or a tourist attraction business. As a result, those PRoWs in the vicinity of the substations are classed as low sensitivity which underestimates the permanent loss of amenity for the public, particularly the local people who rely on the access network to the north of the village for recreation and quiet enjoyment.</p> <p>The LVIAs have not considered the visual impact of the substation from the proposed alternative PRoW that will replace the existing footpath from the village to Little Moor Farm. No illustrative viewpoints have been provided for the proposed route as shown on the DCOs Permanent Stopping Up of PRoW Plan. In consequence, there has been no assessment of the impact of construction and the residual impacts on users of this proposed footpath, it is therefore not clear how the Applicants</p>
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				<p>have therefore concluded in ES Chapter 30 that there will be a negligible residual impact over the long term.</p> <p>ES Chapter 30 (30.6.1.4.2.1. para 232) acknowledges that the permanent diversion ‘could’ result in a significant impact whilst at the same time describing the residual impact on recreation disturbance as negligible significance (Table 30.98). This contradicts the conclusions of the LVIAs which recognises that there will be a significant visual impact for users of the existing PRow network during construction and remaining significant 15 years post construction (29.6.1.3.2). In addition to concerns already expressed regarding the timeliness and effectiveness of the mitigation planting, leads to the conclusion that the impact on PRowS has not been adequately mitigated.</p> <p>In addition, there is a lack of information as to the timing and duration of temporary and permanent closures of the PRowS around the substations site, particularly the provision of the permanent alternative route. It is difficult to reach a conclusion as to the sufficiency of mitigation measures when it is not known how long PRowS will be affected – 2yrs/4yrs/6yrs or more.</p> <p>This is particularly relevant for the permanent closure and the timescale and location for the permanent alternative route. An assessment that considered both the physical resource and the amenity and quality of the user experience on the existing PRowS and the proposed PRowS should have been undertaken as a separate theme in the ESs.</p> <p>b) Further Mitigation/Compensation Required</p> <p>Design</p>
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			<p><i>Project Substations</i> - At present we are not satisfied that the Applicants have taken all reasonable steps to reduce the footprint of the infrastructure at the substation site. The Councils would like the Applicants to fully explore any opportunities for the consolidation of infrastructure, particularly considering the Department of Business, Energy and Industrial Strategy Offshore Transmission Network Review (BEIS OTNR).</p> <p>In addition to the request to consider infrastructure sharing and consolidation, the Councils also consider that the Applicants should explore all opportunities to reduce the size and scale of the onshore substations including commitment to the use of a Gas Insulated Substation (GIS) for the National Grid infrastructure. This should be undertaken pre-consent but also post-consent. There is currently insufficient commitment in the Outline Onshore Substation Design Principles Statement from the Applicants to endeavour to take all reasonable measures to reduce the size and scale of the infrastructure through their design refinement work.</p> <p><i>National Grid Substation</i> - As detailed in response to Question 1.0.18 the Councils are aware that connections offers to three other projects have been provided by NG-ESO. It is understood that if the National Grid substation proposed under the EA1N and EA2 DCOs is consented at Friston, these future projects will connect at this location also. The Applicants have confirmed during discussions that the National Grid substation has designed to accommodate the connection of EA1N an EA2 but not further projects and therefore would need to be extended. The current design of the National Grid substation does not respond to this planned need. The Planning Inspectorate's Guidance on</p>
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				<p>Associated Development permits the provision of development that provides capacity that is likely to be required for another project.</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/192681/Planning Act 2008 - Guidance on associated development applications for major infrastructure projects.pdf</p> <p>The National Grid substation is a strategic connection site, and the design approach should reflect this position in order for the impacts of the current and future schemes to be minimised. The Councils are aware that the use of alternative technology (Gas Insulation Substation (GIS) rather than Air Insulated Substation (AIS)) within the National Grid substation would also significantly reduce the land take required. It is likely that to accommodate the future energy project connections the use of gas insulated technology would be necessary. The Councils have summarised in Section 14 of the LIR (paragraph 14.13) the benefits that a reduction in the footprint of the infrastructure could provide.</p> <p>The Councils also want to ensure that there is sufficient commitment post-consent from the Applicants to take reasonable measures to reduce the size and scale of the infrastructure during the design refinement process. The Councils have therefore requested that an outline design principles statement is also provided for the National Grid infrastructure where commitments can be secured.</p> <p>Reductions in the overall size of the EA1N, EA2 and National Grid substations infrastructure would help to minimise the impacts on landscape and visual amenity, heritage, historic landscape</p>
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				<p>character and PRowS. In addition to design mitigation, the adequacy of specific mitigation set out in relation to the topic matters has been highlighted below alongside what other measures are considered necessary.</p> <p><i>Landscape and Visual Amenity</i> - The Councils are continuing to engage with the Applicants on the growth rates and deliverability of the mitigation in a timely manner. We have sought a commitment to the use of adaptive maintenance and aftercare for the planting. This would allow the aftercare period in relation to the substations mitigation planting to be suspended if specified parameters were not achieved. Targeting management measures could then be agreed to address the issues identified and only upon agreement with the local authority, would the aftercare/maintenance period re-commence.</p> <p>In addition to this, as stated above, the LVIAs identify significant residual impacts on landscape character and visual amenity. The Councils have requested that further offsite planting should be provided in order to help offset the impacts identified. The Councils consider that offsite planting should be provided in strategic locations to reinforce field boundaries and PRowS in the locality.</p> <p><i>Built Heritage</i> - The effects on the settings and significance of the heritage assets identified previously cannot be adequately mitigated by virtue of the planting proposed. The developments will therefore result in residual harm to the setting of a number of listed buildings. Given that it is not possible to directly mitigate the harm caused to the significance of these assets, the Councils have requested that the Applicants provide appropriate compensation. The Councils have discussed with the Applicants</p>
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				<p>the provision of a heritage fund which would provide the opportunity for funding to be made available to pay for works to be undertaken to the affected heritage assets, particularly the church. The intention is that these works would contribute to the long-term conservation of these important designated heritage assets.</p> <p><i>Historic Landscape Character</i> - The Councils have been engaging with the Applicants to seek appropriate compensation in relation to the harm to the historic landscape through the provision of a fund. The fund would be used to commission a monograph and booklet for the local community detailing the historic features and evolution of the area, in addition to funding community archaeological excavation and outreach.</p> <p><i>PRoW</i> - Further mitigation/compensation is considered necessary including the provision of new access and improvements to existing access opportunities in the vicinity of Friston village.</p>
1.0.4	Applicants, ESC, SCC, HE, NE, AONB Board, PCs, SASES, SEAS, SoS	<p>Design Mitigation: Adverse effects - AONB</p> <p>Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer.</p>	1 2	<p><i>ESC Lead Authority</i></p> <p><i>Onshore Infrastructure</i></p> <p>No - The Councils consider that further modifications to the design and build process should be explored. The Councils would like the Applicants to commit to the simultaneous construction of the projects in order to reduce impacts on the Area of Outstanding Natural Beauty (AONB). If this is not considered possible and the Examining Authority accept the Applicants' reasoning for this, the Councils consider the first project should install the ducting for the cabling of the second project. This would reduce the impact of</p>

		<p>b) If not, what further measures are required?</p>		<p>construction on the AONB and meet the statutory duty (s85 of the Countryside and Rights of Way Act 2000 (CRoW Act)) to have regard to the purposes of the AONB ‘to conserve and enhance the natural beauty of the area’.</p> <p><i>Offshore Turbines</i></p> <p>No - The Councils consider that the EA2 array will undermine the purposes of the AONB designation as defined by s82(1) of the CRoW, that is, “conserving and enhancing the natural beauty of the area”. The Applicant’s Seascape, Landscape and Visual Impact Assessment (SLVIA) in relation to EA2 has identified significant effects on the special qualities of the AONB as a result of the offshore turbines, notwithstanding the Applicant’s design modifications comprising the modestly extended separation of the EA2 and EA1N arrays and reduction in height of the wind turbines. No update to the SLVIA has been provided to understand the implications of the Applicant’s commitment to a reduction of the turbine heights of EA2 to 282 metres, however the Councils are of the view, taking this reduction into consideration, that the project would still result in significant effects on the special qualities of the AONB. The Councils consider that further design modifications should be explored, for example a further reduction in height, to reduce this impact and meet the statutory duty ‘to conserve and enhance the natural beauty of the area’. At present it is not considered that sufficient weight has been attributed by the Applicant to the statutory purpose of the AONB.</p> <p>In terms of the precise height and layout that would achieve an acceptable scheme, we defer to Natural England on this matter and will be guided by them.</p>
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					The Councils consider that appropriate compensation should also be provided in relation to any residual effects on the AONB as a result of the EA2 project.
1.0.8	Applicants, ESC, SCC, HE, NE, AONB Board, PCs, SASES, SEAS, SoS	<p>Design Principles</p> <p>a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission’s Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning.</p> <p>b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate?</p> <p>i) A ‘design champion’ to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings,</p>	1	2	<p><i>ESC Lead Authority</i></p> <p>In response to the particular question posed to the local authorities at (b)(v):</p> <p>In the opinion of the Councils these or similar measures would be welcomed and are likely to help to secure good design and ensure effective engagement of key local stakeholders in the process.</p> <p>The Applicants have provided an Outline Onshore Substation Design Principles Statement (APP-585) which includes design principles which will underpin the design of the onshore substations for EA1N and EA2. This is a useful document and its submission early in the process allows stakeholders to provide comments.</p> <p>The Councils welcome the commitment from the Applicants for the landscape and building design to be subject to design review. It is also stated that the substation building “<i>should be sensitively placed, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, colouration and finishes</i>” (APP-585). Although useful wording, there is considered insufficient commitment to ensure reasonable endeavours are taken to minimise the size and scale of the substations. The wording of the design principles excludes the substation infrastructure more generally and only relates to the substation building design. The Councils would welcome a</p>

		<p>compounds, security fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity.</p> <p>ii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals;</p> <p>iii) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design;</p> <p>iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees.</p> <p>v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design?</p>		<p>commitment from the Applicants to use their best endeavours to explore opportunities through the design refinement process to reduce the scale and size of the substations overall. Additionally, it is hoped the commitment to seek gains for public amenity, which is identified in the outline design principles. would also include the consideration of providing areas of open access land.</p> <p>The commitment in the Outline Onshore Substation Design Principles Statement to continue engagement with Parish Councils, local residents and the relevant authorities on the design and landscape proposals is welcomed. It is however considered that this engagement must be more than a single consultation. Good design is a process which the key stakeholders, particularly the affected local community should be part of. The Councils would therefore fully support the provision of a document outlining the proposed design process including timelines and details of the consultation to be undertaken. This would provide greater transparency and articulate in outline form, the process through which the local community would be involved, and at which stages in the design process this would be.</p> <p>The Councils believe the design principles should also relate to the National Grid substation, or this substation should have its own design principles document.</p> <p>It is agreed that the inclusion of a design champion who would advocate the achievement of good design and seek to ensure that the design principles were carried through would be a beneficial addition which is currently not proposed.</p>
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1.0.18	SCC, ESC, PCs, SASES, SEAS, SoS	<p>Site selection: Friston grid connection point</p> <p>To the extent that it was suggested at OFHs 1 – 2 that there may be additional grid connection proposals for this location, please catalogue any additional connection offers of which you are aware</p>	1 2	<p><i>ESC Lead Authority</i></p> <p>The Councils are aware of the following grid connection proposals:</p> <p><u>Nautilus and Eurolink Interconnectors</u></p>

		<p>that have been made on a formal or informal basis and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.</p>		<p>Nautilus Interconnector – 1.4GW HVDC subsea electricity link between GB and Belgium – Developer is National Grid Ventures (NGV) – Expected operation date 2028. The project has a webpage on the National Grid website https://www.nationalgrid.com/group/about-us/what-we-do/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus. A Briefing Pack containing information on the Nautilus project is also available (https://www.nationalgrid.com/document/125601/download).</p> <p>Eurolink Interconnector – 1.4GB HVDC subsea electricity link between GB and Netherlands – Developer is NGV.</p> <p>It is known that the projects are considering a landfall point between Thorpeness and Sizewell and will require cabling to a converter station location and National Grid connection substation. A typical footprint for a converter station requires an area of five hectares with a maximum height of 24 metres. National Grid Electricity System Operator (NG-ESO) has provided grid connection offers for both Nautilus and Eurolink to a new 400kV substation located close to the Sizewell 400kV network.</p> <p>The connection offer is identified on the Interconnector TEC register on the National Grid website (https://www.nationalgrideso.com/connections/registers-reports-and-guidance). The point of connection is known to be the National Grid substation proposed under the EA1N and EA2 projects at Friston.</p> <p>NGV has stated that for Nautilus and Eurolink to connect to the National Grid substation at Friston, the substation would require an extension for each project. NGV has confirmed that the</p>
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			<p>maximum land take required to facilitate the extension is approximately 1.3 hectares for each connection offered (https://www.nationalgrid.com/document/132456/download).</p> <p><u>Galloper Extension/Five Estuaries Offshore Windfarm</u></p> <p>Galloper Extension/Five Winds Offshore Windfarm – Capacity 353MW – Developer formerly Innogy now RWE – Round 3</p> <p>In August 2019, the Crown Estate announced the conclusions of the Habitats Regulations Assessment (HRA) confirming that seven projects including the Galloper Extension project were granted development rights.</p> <p>The National Grid TEC register of connections identifies a connection offer for the Galloper Extension project (https://www.nationalgrideso.com/connections/registers-reports-and-guidance). An e-mail sent from the developer to a Town Council in East Suffolk confirmed that the connection offer from NG-ESO relates to the substation proposed at Friston (See Appendix A of this document).</p> <p>Although there is limited information within the public domain on this project, it is considered that National Grid could provide an estimation for the footprint of the extension required to the National Grid substation to accommodate this project.</p> <p><u>Greater Gabbard Extension/North Fall Offshore Wind Farm</u></p> <p>Greater Gabbard Extension/North Falls Offshore Wind Farm – Capacity – 504MW – Developed by SSE Renewables and RWE – Expected operational date 2030.</p>
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					<p>In August 2019, the Crown Estate announced the conclusions of the HRA confirming that the Greater Gabbard Extension project was granted development rights. It is understood that the Agreement for Lease has not also been signed.</p> <p>At present there is no record of a connection offer on the National Grid connections register but a connection offer is anticipated shortly given that an Agreement for Lease has been signed and the website identifies that from 2020 project design work and community engagement will commence (https://www.northfallsoffshore.com/).</p>
1.1	Aviation				
		No Questions			
1.2	Biodiversity, Ecology and Natural Environment (Including Habitat Regulation Assessment (HRA))				
	Over-Arching HRA				
		No Questions			
	Offshore Ornithology				
		No Questions			
	Marine Mammals				
		No Questions			
	Benthic Ecology				
		No Questions			
	Fish and Shellfish Ecology				
		No Questions			
	Terrestrial Ecology				
1.2.55	NE, ESC, SCC, Suffolk Wildlife Trust (SWT)	EMP As drafted, the DCO would allow individual EMPs to be brought forward for each stage of the transmission and	1	2	<p><i>ESC Lead Authority</i></p> <p>The OLEMS provides an adequately comprehensive framework for the required Ecological Management Plans (EMP). The OLEMS describes the mitigation measures embedded within the</p>

		grid connection work (onshore) under R11. Does the OLEMS provide a robust framework within which each of these separate EMPs could be produced?			projects and, at a high level, the additional mitigation measures which may be required in relation to each ecological receptor. As identified in the OLEMS these additional mitigation measures will need to be informed by up to date pre-construction surveys ahead of the finalisation and approval of any EMPs. We consider that this is an appropriate approach as it will mean that additional mitigation measures will be able to be deployed where they are required based on the most up to date ecological survey information.
1.2.56	NE, ESC, SCC, Suffolk Wildlife Trust (SWT)	<p>Schedule of Mitigation, R21 and EMP</p> <p>The Schedule of Mitigation [APP-575] repeatedly refers to adherence to the EMP as the mitigation but no draft EMP is provided. R21 requires the EMP to accord with the OLEMS. Are you satisfied that the OLEMS provides sufficient detail/certainty of specific mitigation measures and is there sufficient information for preparing future LMP(s)/EMP(s)?</p>	1	2	<p><i>ESC Lead Authority</i></p> <p>The OLEMS adequately describes the mitigation measures which are currently considered likely to be required based on the findings presented in the ESs, with the exception of those described for bats, hedgerows, woodlands and trees (please see 1.2.76 below for more detail). As recognised in the OLEMS there will need to be a number of pre-construction ecological surveys undertaken to refine and confirm the necessary mitigation measures for each construction section, these will be necessary ahead of the finalisation of the relevant EMPs to ensure the required mitigation is deployed in the required location based on up to date evidence.</p>
1.2.59	Applicants, NE, ESC, SCC, Suffolk Wildlife Trust (SWT)	<p>Pre-construction surveys</p> <p>A number of pre-construction ecological surveys are proposed prior to the production of the EMP(s). a) How are the pre-construction surveys secured?</p>	1	2	<p><i>ESC Lead Authority</i></p> <p>The pre-construction surveys currently identified as required are set out in the OLEMS. The requirement to undertake pre-construction survey is currently secured by Requirement 21 requiring the production of EMPs which are to be in accordance with the OLEMS.</p>

		b) Should they be individually listed in R21?		Whilst it is not considered necessary for the pre-construction surveys to be individually listed in Requirement 21, we do consider that Requirement 21 should explicitly make reference to the need for them. As currently drafted, we consider that the requirement gives greater weight to EMPs being based on the findings of the surveys which informed the ESs, rather than pre-commencement surveys which would be more up to date. This could lead to the EMPs being drafted based on out of date evidence, which could in turn lead to delays in discharging the requirement.
1.2.61	Applicants, ESC, SCC, SWT	<p>Biodiversity Net Gain and enhancement</p> <p>SCC and ESC have raised concerns regarding the lack of commitment to biodiversity and net gain. Whilst noting that DEFRA has confirmed that Net Gain is not applicable to NSIPs in the UK Government's draft Environment Bill, paragraph 5.3.4 of NPS EN-1 states that the Applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.</p> <p>a) Please could the Applicant provide an explanation of how they consider the application has taken advantage of enhancing biodiversity?</p>	1 2	<p><i>ESC Lead Authority</i></p> <p>Response to b)</p> <p>Paragraph 5.3.4 of EN-1 requires that <i>"The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests"</i>. The Councils do not consider that the projects have fully taken advantage of the opportunities to enhance biodiversity. Whilst proposals at the substations include a landscape planting scheme, the primary purpose of this landscaping is to mitigate landscape and visual impacts and it has not been demonstrated that the ecological enhancement opportunities have been maximised. Within the landfall and cable route parts of the projects, whilst it is understood that there are fewer opportunities to deliver ecological enhancement, some opportunities (such as reinforcement planting of existing hedgerows) do exist and these have not been explored (except where they relate to mitigating potential landscape and visual impacts). At present therefore, the Councils do not consider that the projects comply with 5.3.4 of EN-1.</p>

		<p>b) Please could Natural England/ESC/SCC/Suffolk Wildlife Trust give a reasoned response on whether they consider the project accords with paragraph 5.3.4 of NPS EN-1.</p> <p>Please can you ensure that matters pertaining to biodiversity enhancement are included in the SoCGs</p>			<p>As part of the Statement of Common Ground (SoCG) process the Councils remain in discussion with the Applicants on the ecological enhancements that could be delivered by the developments.</p>
1.2.70	Applicants, NE, ESC, SCC, SWT	<p>Bats</p> <p>ES Chapter 22 states as a worst case scenario it is assumed that the construction phase could result in approximately 11km of hedgerow being temporarily lost in the medium to long term (paragraph 196) which would represent an impact of at worst major adverse significance on bats. Please could you respond to the following points.</p> <p>a) Proposed mitigation includes reinstatement post construction which may take 5-7 years to establish. Appendix 6.4 of the ES – Cumulative Project Description [APP-453] does not include a programme of works for the onshore cable route. If the projects are constructed sequentially could the Applicant please confirm the maximum</p>	1	2	<p><i>ESC Lead Authority</i></p> <p>In response to the particular question posed to the Councils at (g):</p> <p>The OLEMS sets the requirement for the reinstatement of hedgerows removed during construction and also requires the submission of a “<i>detailed scheme of hedge planting aftercare</i>” prior to commencement. The OLEMS is a certified document in the draft DCOs. Requirements 14 and 21 require the LMP and EMP to accord with the OLEMS. The inclusion of hedgerow replanting and aftercare detail within the LMP and EMP relevant to each construction section is sensible to ensure that all ecological mitigation requirements are detailed in the same document(s). This scheme should also detail the length of the aftercare period which should be a minimum of five years for the cable route and landfall.</p> <p>The Councils have requested that the Applicants commit to an adaptive maintenance and aftercare period within Requirement 15 and the OLEMS in relation to the mitigation planting proposed at the substations site which includes hedgerow planting.</p>

		<p>duration that they would anticipate that the hedgerows would be removed before reinstatement begins?</p> <p>b) Can you confirm that this duration was assessed as part of the ES?</p> <p>c) Would there be any long term impacts on bat populations as a result of this duration?</p> <p>d) Please can you include the programme of works for the onshore cable route in the amended Cumulative Project Description requested in question 1.0.16.</p> <p>e) Can the Applicant please provide further information on why certain transects were chosen? Why was long covert excluded from transect 2 [APP-281]?</p> <p>f) Could the Applicant confirm if they intend to submit an outline hedgerow mitigation plan?</p> <p>g) Are Natural England/ESC/SCC/Suffolk Wildlife Trust satisfied that the reinstatement, management and maintenance of the replacement hedgerows is satisfactorily secured?</p>		<p>Additional construction measures, to mitigate for the gaps created in hedgerows during construction and which will be present in the early reinstatement period, are currently being discussed with the Applicants via the SoCG process.</p> <p>The Councils are satisfied that the reinstatement hedgerow planting is adequately secured through both the LMP and EMP by virtue of the commitments within the OLEMS subject to amendments in the OLEMS to commit to adaptive aftercare and maintenance for the mitigation planting at the substations site.</p>
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		<p>Should this be contained within the LMP or EMP?</p> <p>h) Can the Applicant please confirm when an updated CIA with Sizewell in relation to bats will be submitted into the Examination?</p> <p>Please can Natural England confirm that they are satisfied that Figure 22.7a-g [APP-280] clearly maps the roosting, foraging and commuting areas for bats in relation to the red line boundary?</p>			
1.2.74	ESC, SCC	<p>Arboricultural Method Statement (AMS)</p> <p>The Schedule of Mitigation [APP-575] states at ref 5.4 that woodland planting would be implemented through the LMP and AMS. Are you satisfied that this is sufficiently secured? Should this be in the LMP or EMP? Is there sufficient information in the OLEMs to satisfy that an AMS will do its job?</p>	1	2	<p><i>ESC Lead Authority</i></p> <p>Details of new woodland planting should be set out in both the LMP and EMP as both documents serve different purposes. As the woodland planting is to compensate the loss of existing woodland, it must fulfil both landscape and ecological functions and therefore inclusion in both Management Plans should help ensure that it is designed, implemented and managed to achieve both of these requirements.</p> <p>An Arboricultural Method Statement (AMS) is considered necessary in relation to all tree removals together with tree protection measures during the course of all construction activity. Providing the AMS will be submitted and carried out in accordance with BS5837: 2012 the Councils accept the AMS will provide sufficient protection.</p>
1.2.75	ESC, SCC	Growth rate	1	2	<i>ESC Lead Authority</i>

		<p>Please expand on your concerns regarding planting growth rates.</p>	<p>The Applicants' landscape and visual impact mitigation strategy is reliant on predicted growth rates for new tree planting, that may well not be possible given the local weather conditions. The evidence behind the predicted growth rates appears to be based on non-current weather patterns and UK national averages for new tree planting.</p> <p>The described growth rates are based on an Institute of Environmental Management and Assessment (IEMA) article titled 'Predicting the Growth of Trees and Hedge Planting when Determining the Effectiveness of Mitigation' and understood to be dated 2019. From this article the Applicants seem to be relying on predicted <i>national average</i> growth rates for newly planted mitigation planting. Being averages, it logically follows that within the range of growth rates recorded across the country, some must have been higher than average (where growing conditions are particularly favourable such as in the West Country or Welsh Marches), and others must have been below average (where growing conditions are limiting such as East Anglia). It is well established that East Anglia has some of the lowest rainfall amounts in the UK, and soils towards the coast tend to be light and free draining. Given that the Applicants are relying on a national average figure, and that East Suffolk clearly is below average ideal growing conditions, it seems highly likely that the predicted growth rates will not be achieved.</p> <p>Further details of the Councils' response to this issue is given in the LIR Paras 15.22-15.26 and Appendix 3 of the LIR.</p> <p>We continue to engage with the Applicants to develop an approach of adaptive aftercare, based on the approach used for the restoration of minerals sites, which will seek to place a</p>
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					robust system in place to deal with failing or unsatisfactory planting.
1.2.76	ESC, SCC	<p>Ecological receptors</p> <p>Please expand on your concerns [RR-002 and RR-007] that there are some ecological receptors which are either not considered to have been fully assessed or have insufficient mitigation/compensation measures identified within the ESs and secured in the dDCO.</p>	1	2	<p><i>ESC Lead Authority</i></p> <p>The Councils consider that the construction impacts on bats, hedgerows, woodlands and trees and the construction-related impacts on air quality (in the context of designated sites) and the operational noise impacts have not been fully assessed in the ESs.</p> <p>For bats, ES Chapter 22 identifies that the loss of habitat suitable for bat foraging and commuting (primarily hedgerows and areas of woodland) would result in a “moderate adverse” impact on this receptor in the “short term” after mitigation measures have been applied (22.6.1.9.3). The Councils are concerned that the duration of the impact has been under assessed. If the proposed replacement planting does not proceed as planned or does not develop as quickly as anticipated (see our comments above in response to Q1.2.75) a minimum of a “medium term” impact will occur. This could result in greater impacts on local bat populations as the length of the works and lack of mitigation/compensation will have potentially resulted in less food availability (e.g. by severance of connections to feeding areas) which in turn will result in poorer breeding success and population declines. However, since the publication of the ESs the Applicants have engaged with the Councils through the SoCG process to further explore these concerns and identify additional mitigation measures that could be implemented during the construction and early reinstatement phases to help address these impacts. This includes the proposed use of hurdles installed within the newly created hedgerow gaps to provide</p>

				<p>mitigation for the loss of connectivity which would occur. It is considered that this would help address commuting impacts on bats. Discussion is also underway regarding measures that could be implemented alongside the hurdles to lessen the impact on foraging bats. Further detail on this will be included in the SoCG and final designs could form part of the relevant EMPs.</p> <p>With regard to hedgerows, woodland and trees our concern relates to the proposed growth rates set out in the ESs. As described in our response to Q1.2.75, we consider that these growth rates are overly ambitious given local climatic conditions and therefore the replanted hedgerows, woodland and trees will not provide the same ecological function as those being lost as quickly as presented in the ESs. Where possible earlier planting could help to address this concern, however this is not possible in all locations (such as where planting is for reinstatement following construction). In locations where planting is for reinstatement, the additional measures described above could help mitigate the impacts of hedgerow loss on species such as bats, however the Councils do not consider that there are any additional measures available which could address our concern in relation to how long it will take new planting to grow to a sufficient size that it will ecologically function in the same way as the existing vegetation.</p> <p>In addition, with regard to replacement woodland planting, the ESs propose that only "...at least an equivalent area of lost woodland is replanted..." (paragraph 22.6.1.4 190). Whilst this will provide compensation at a spatial scale, it will not deliver an equivalent quality of habitat, nor will it allow for the decline in habitat quality which will be experienced whilst new planting matures. The Councils have requested that the Applicants</p>
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				<p>commit to an adaptive maintenance and aftercare scheme for the woodland planting. This would allow the aftercare period to be suspended if the woodland planting was not meeting set objectives. The Councils have also requested details of how the woodland will be secured long-term and details of its long-term management. It is considered that the OLEMS should be updated with this information. The Councils have also been engaging with the Applicants regarding the provision of additional offsite planting which could help to provide further tree planting. With regard to air quality impacts, whilst impacts from nitrogen deposition on designated sites are assessed in the ESs, it is not clear that impacts from acid deposition arising from NOx emissions from construction vehicles during construction have been fully assessed. The Applicants are currently preparing an air quality clarification note as part of the SoCG process to provide further information on the air quality studies undertaken to date, how these have informed the assessment of impacts on ecological receptors and whether any additional mitigation measures are required.</p> <p>With regard to noise impacts, the ESs conclude that operational noise will at worst result in a “Minor Adverse” ecological impact (paragraph 22.6.2.2 251). However, this appears to be based on assessment undertaken in relation to human noise receptors. Using the results of assessment for impacts on human receptors as a proxy for ecological impacts is not appropriate as high frequency noise is not directly assessed (as it is beyond the range of human hearing). This has significant ramifications for a range of ecological receptors, particularly bats which rely on echolocation (using high frequencies) for foraging, commuting and socialising. As part of the SoCG process the Applicants are</p>
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					currently reviewing the noise assessment in relation to ecological receptors.
1.2.79	ESC, SCC	Noise Please can you confirm what assessments you would expect to see in relation to the impact of noise on ecological receptors? [RR-002] and [RR007]	1	2	<i>ESC Lead Authority</i> The assessment of ecological impacts arising from operational noise presented in the ESs was based on assessment using human receptors and thresholds. The assessment of noise on ecological receptors should identify potentially vulnerable ecological receptors; identify whether they will be subject to noise levels in the range which is likely to result in impacts (for bats it will be necessary to consider whether any high frequency noises will be generated which could impact on foraging and commuting behaviours); assess the significance of any impacts identified and identify any mitigation measures necessary to reduce identified impacts to acceptable levels.
Onshore Ornithology					
1.2.90	NE, ESC, SCC, SWT	Seasonal restrictions In point 1 of Table 37 [AS-036] the Applicant has confirmed that the seasonal restriction proposed by the Applicant applies only to works associated with crossing the SPA and works associated with crossing the SPA within 200m of the SPA. • Please can you set out your reasons for advising that all cable line construction works in the boundary, or within 200m of	1	2	<i>ESC Lead Authority</i> The Sandlings Special Protection Area (SPA) is designated for its breeding woodlark and nightjar interest. The section of the Leiston-Aldeburgh SSSI crossed by or adjacent to the cable route contains habitats suitable for breeding birds. Additionally, surveys undertaken to inform the ESs did not record any SPA citation species within the area proposed for the SPA crossing. Given the nature of the construction works proposed, the Councils consider that seasonal restrictions to ensure that works are undertaken outside of the bird breeding season are adequate to avoid unacceptable impacts on the SPA.

		<p>the Sandlings SPA and Leiston to Aldeburgh SSSI is undertaken outside the breeding bird season. Do you consider that the Applicant's response on this point is capable of having acceptable impacts on the SPA?</p>		<p>With the exception of the landfall the boundaries of the Sandlings SPA and the Leiston to Aldeburgh Site of Special Scientific Interest (SSSI) are the same where the designated sites are close to or are crossed by the cable route. As both designated sites have breeding birds as part of their interest features the comments on seasonal working restrictions apply to both.</p> <p>At the landfall, the only designation is the SSSI, but in this location the use of HDD will avoid impacts on habitats suitable for nesting birds which are citation features.</p>
1.2.91	Applicants, ESC, SCC	<p>Landfall</p> <p>a) In light of the sensitivity of the inter-tidal area is sufficient information currently provided to secure the embedded mitigation of HDD at landfall?</p> <p>b) Should the dDCO provide additional clarification/detail such as through the expansion of R13 to set out what should be included?</p>	1 2	<p><i>ESC Lead Authority</i></p> <p>Response to a):</p> <p>From an ecological impact perspective, the Councils consider that there is adequate information provided to secure Horizontal Directional Drilling (HDD) as the construction method at the landfall and therefore avoid any impacts on sensitive ecological receptors in this location. The Applicants have provided a draft Outline Landfall Construction Method Statement (OLCMS) which is satisfactory from an ecological perspective.</p> <p>From a coastal management perspective, at present the Councils do not have details of the HDD drill line, profiles, entry and break out locations. Full details of the Applicants' approach to management of vibration risk to the cliff stability is also not yet agreed. The Applicants have however provided the Councils with a draft OLCMS. This confirms the Landfall Construction Method Statement (LCMS) secured by Requirement 13 of the draft DCOs will require both outstanding design and construction method</p>

				<p>details in relation to the HDD drill line, profiles entry and break out locations to be submitted for approval.</p> <p>Response to b)</p> <p>The Councils require the draft DCOs to be updated to include the OLCMS as a certified document. The Councils will then be satisfied that Requirement 13 will secure the necessary outstanding information and give ESC the necessary authority to ensure an outcome that meets the Council's objectives. If however, the OLCM is not certified into the DCOs, Requirement 13 will need to be updated to clearly identify the matters which will be included in the final LCMS.</p>
1.2.93	NE, ESC, SCC, SWT	<p>Nightingale</p> <p>The proposed mitigation for nightingale includes the creation of habitat somewhere where the onshore development area overlaps the SPA/SSSI. This is deferred to the EMP. Are you confident that such a suitable area can be found?</p>	1 2	<p><i>ESC Lead Authority</i></p> <p>The Applicants, in consultation with Natural England (NE), ESC, SCC and the RSPB, have prepared a draft Method Statement for the SPA Crossing. This sets out the proposed mitigation measures for nightingale in this area which the Councils are satisfied with.</p>
1.2.94	NE, ESC, SCC, SWT	<p>Marsh Warbler and Bewick's Swan</p> <p>ES Chapter 23 identifies pre-mitigation effects on Marsh Warbler and Bewick's Swan for disturbance during construction with mitigation secured through the BBPP. No outline BBPP has been provided. Are you satisfied that this is sufficiently secured?</p>	1 2	<p><i>ESC Lead Authority</i></p> <p>The information provided in the ESs identifies that only one Marsh Warbler territory was recorded within the survey area. Given the status of breeding Marsh Warbler within the country it is important that any impacts are adequately mitigated. The Councils consider that subject to the use of HDD at the landfall and construction being outside of the breeding bird season both in the Special Protection Area (SPA) and within 200m of it, both</p>

				<p>of which are committed to in the ESs, it is appropriate to secure final mitigation details through the Breeding Birds Protection Plan (BBPP) where they can be based on pre-construction survey results.</p> <p>With regard to Bewick's Swan, of the habitats within the red line boundary these are only likely to use arable land during the winter period. No Bewick's Swans were recorded within the red line boundary during the surveys which inform the ESs, although they were recorded in one location to the north of the cable route. Given the habitat types used by this species and the fact that there can be variation in this from year to year, the Councils consider that it is acceptable to defer details of any necessary mitigation measures for this species to the BBPP which will be based on up to date pre-construction surveys.</p> <p>The BBPP is secured by Requirement 21 of the draft DCOs and there is a section in the OLEMS (6.4) which provides an outline of what the final document will contain. The Councils are satisfied with the principle of the information provided in the OLEMS and do not consider that an outline BBPP is required.</p>
1.2.95	Natural England/ESC/SCC/NWT	<p>Turtle Doves</p> <p>Do you consider that the compensatory measures for turtle doves provides at least an equivalent value of biodiversity to that which is being lost?</p>	1 2	<p><i>ESC Lead Authority</i></p> <p>As with Nightingale, the Applicants, in consultation with NE, ESC, SCC and the RSPB, have prepared a draft Method Statement for the SPA Crossing. This sets out updated proposed mitigation measures for Turtle Dove. The Councils are satisfied that the measures proposed will provide at least equivalent compensatory measures to those that will be lost during the construction period.</p>

					The Outline SPA Crossing Method Statement should be certified into the draft DCOs and referenced either within Requirement 21 or in the OLEMS. This will ensure that mitigation in the outline method statement will be secured within the DCOs.
1.3	Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations				
		No questions			
1.4	Construction				
		No Questions			
1.5	Draft Development Consent Order (DCO)				
1.5.5	SCC, ESC	<p>Art 12 would enable the undertaker to seek approval for accesses to the highway, other than those listed in Schedule 5. Approval would be deemed to have been given if no decision were to be notified within 28 days.</p> <ul style="list-style-type: none"> • Are you satisfied that 28 days is sufficient time for you to consider such requests fully and properly? 	1	2	<p><i>SCC Lead Authority - Highways</i></p> <p>Article 12 refers to stopping up of streets of approval of accesses. It is unclear if the Applicants will liaise with emergency services with regard to temporary closures or if the local highway authority is expected to do so. Applications for road closures currently require three months' notice https://www.suffolk.gov.uk/roads-and-transport/roadworks/apply-for-a-temporary-road-closure/</p> <p>Article 13: Technical approval of highway works is a more detailed process than planning approvals. The Local Highway Authority (LHA) does not have the resources necessary to</p>

					technically approve details within 28 days. At least double this amount of time would be required.
1.6	Electricity Connections, Infrastructure and Other Users - The Applicant and other respondents are referred to ExQ1.0.17 and 1.0.18 on site selection and other potential grid connections as providing the starting context from which responses to these questions should be formed.				
		No Questions			
1.7	Flood Risk, Water Quality and Resources				
1.7.9	SCC	<p>Flooding incidents along East Suffolk Coastline</p> <p>The FRA states that the Level 1 SFRA reports a number of notable flooding incidents along the East Suffolk coastline. Can you confirm if any of the incidents affected the landfall location? The response should include details of such events including location, date and extent.</p>	1	2	<p><i>ESC Lead Authority</i></p> <p>The Council are not aware of any historical flooding incidents from abnormally high sea levels which have affected the landfall site. The Transition Bay is located on a cliff top that is well above any recorded or predicted sea level anticipated to occur during the service life of the asset. The buried infrastructure linking the Transition Bay with the bored break out point is below, within and above the normal tidal range. Unusually high tides will therefore cover more of this zone than normal tidal action and may lead to erosion/accretion of the surface. The impact of this potential change in ground level is considered elsewhere in the DCOs.</p> <p>Although ESC has responded to this question following a request from SCC, either SCC as Lead Local Flood Authority or the Environment Agency will lead on flood risk questions going forward.</p>
1.7.10	SCC	<p>Existing drainage patterns</p> <p>Please expand on the comments in your RR that the information within the FRA is</p>	1	2	<p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>For clarity, the Relevant Representation (RR) referred to the “information within the application”, not specifically the Flood</p>

		<p>not sufficient to determine how the proposed development would interact with existing drainage patterns. What information would you expect to see?</p>		<p>Risk Assessment (FRA). Whilst this does include the FRA, it also extends to the ES, Outline Code of Construction Practice (OCoCP) & OLEMS. To avoid repetition, the concerns with the OCoCP & OLEMS are found in response to question 1.7.11.</p> <p>The flooding of Friston in October 2019 provided SCC LLFA with evidence of multiple surface water flow paths surrounding Friston that are not shown accurately on EA National Mapping, despite the return period of the rainfall event being recorded as 1 in 40 (likely less due to a lack of historic rainfall records at rain gauge), thus well within the intended scope of this mapping. Subsequently, the Friston Surface Water Management Plan (SWMP) has been produced. The hydraulic model is more refined than the EA National Mapping and presents a more accurate baseline. On this basis, SCC LLFA cannot agree that an FRA based on superseded information is suitable. Given the recognition in the FRA of the historic surface water flooding issues experienced by Friston, it would have been prudent for the Applicants to have established a model themselves to have used as a baseline for the original assessment. Nonetheless, they have the SCC LLFA model and could assess the interaction of the proposed development with this new baseline.</p> <p>The submitted FRA identifies the surface water flow path north of Friston and acknowledges the interaction between this and the proposed development. This flow path is associated with multiple existing ordinary watercourses, an offline storage/infiltration basin (which provide significant interception) and ultimately enters at the head of the Main River in Friston on Church Road. Whilst acknowledging the proposed developments interaction with this key flow path, the Applicants have not provided any further details on this matter or any potential</p>
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			1	<p>mitigation. We acknowledge the Applicants have reserved an area for a potential additional flood relief basin, however it is not possible to determine the suitability of this proposal due to a lack of supporting information. SCC LLFA have a clear policy of not permitting the culverting of watercourses. Whilst Land Drainage Act consent is separate to the DCO process, it is important to understand the impact of the development on this key flow path in order to understand the associated impacts on surface water flood risk.</p> <p>Given multiple flow paths are identified in the SWMP to the east of Friston and this is the route the cable corridor will take, the potential for interaction with previously unidentified surface water flows paths, particularly adjacent Grove Road, Friston, should be assessed.</p> <p>We expect the residents of Friston to be included in the ESs as a receptor. This has currently been omitted by the Applicants on the basis that they have committed to not increasing flood risk. The cumulative impact during construction of an increase in sediment supply and any subsequent increase in flood risk, given the culverted nature of the watercourse in Friston, should also be assessed to determine any need for monitoring/maintenance of the Main River during construction.</p>
1.7.11	SCC, ESC	<p>Outline Code of Construction Practice (OCoCP) and Outline Landscape and Ecological Management Strategy (OLEMS)</p> <p>Are you satisfied that there is sufficient information in the OCoCP to satisfactorily</p>	1	<p>2</p> <p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>No, the Councils are not satisfied that either the OCoCP or the OLEMS provides sufficient security to secure later agreement.</p> <p><u>Outline Code of Construction Practice</u></p>

		<p>secure the SWDP and Flood Management Plan and within the OLEMs to secure the final SuDs?</p>		<p>This document lists multiple mitigation options, some of which do not demonstrate an approach which prioritises the use of Sustainable Drainage Systems (SuDS), as per NPS EN-1. We are aware from the construction of East Anglia One (EA1) & East Anglia Three (EA3) cable corridor of problems encountered in the management of surface water that resulted in reactive, proprietary surface water drainage solutions (such as silt busters) being implemented. The EA were involved with this at the time. Our understanding is that this was caused by a lack of space available for SuDS (hence the use of proprietary products). The proposed developments do not demonstrably allocate space for SuDS along the cable corridor. We acknowledge the submission refers to areas where topsoil will be removed to facilitate basins, however it has not been demonstrated these basins;</p> <ul style="list-style-type: none"> • Can be accommodated within the redline boundary; • Can be sized to manage 1:100 + CC; • Can be designed to provide treatment; • Can discharge surface water in a sustainable manner and in accordance with the surface water disposal hierarchy; and • Do not result in knock on impacts such as increasing the height of topsoil storage elsewhere <p>Given the proximity of Friston and the known surface water flood risk, this approach is not satisfactory. For example, where the cable route crosses Grove Road, Friston, is a low point of the cable corridor with the contributing area from the east extending some 700m to the upper extent of the catchment. A cable corridor of 700m length, falling towards Grove Road, Friston, (which has known surface water flooding problems) with no demonstrably feasible method of managing and disposing of surface water in a sustainable manner is not satisfactory and has the potential to increase off site flood risk.</p>
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				<p>No details have been provided to demonstrate that the proposed Construction Consolidation Site's (CCS) required for the construction of the cable corridor and substations have a demonstratable method of managing surface water, including treatment. Indeed, the Applicants' response from Appendix 20.1 (pg 18), states the CCS's will not require their own SuDS ponds.</p> <p>Appendix 20.1 (pg 19) & 20.6.1.1 state that there are no ordinary watercourse crossings on the cable route. This is contradicted by para 11 of Appendix 20.3. The mitigation options need to be site specific, for which the site characteristics need to be known. If indeed no ordinary watercourses are present and thus, all construction surface water must be infiltrated (in the absence of alternatives), the absence of infiltration testing is potentially problematic and at the very least leaves questions regarding feasibility of sustainable surface water disposal during construction.</p> <p>It is also unclear how the proposed haul road/access roads will be sustainably drained.</p> <p><u>Outline Landscape and Ecological Management Strategy</u></p> <p>It should be noted that we have requested the Applicants provide a specific Requirement relating to surface water management for the final SuDS as opposed to including this in the OLEMS, as was the case for EA1.</p> <p>No information is provided in the submission to enable SCC LLFA to determine whether the proposed SuDS basins are sufficiently sized to manage the volumes of surface water generated by the proposed development. No other design assumptions such as</p>
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				impermeable areas served by the SuDS, design water depths, side slopes etc. are provided with the submission. In addition to this, as far as we are aware to date, the Applicants have not undertaken any infiltration testing. Our understanding is that the Applicants intend to pursue a positive discharge to the Main River in Friston, regardless of infiltration results, the degree of infiltration would merely act as a contribution to reducing, but not removing the positive discharge. We have made it very clear to the Applicants that this is not an approach we support.
1.7.13	Applicants, SCC	<p>Adoption and maintenance Paragraph 5.7.10 of NPS EN-1 states that the DCO or any associated planning obligations should make provision for the adoption and maintenance of any SuDs, including any necessary access rights to the property. It does not appear that such details have been included with the application.</p> <p>a) Do you take responsibility for maintaining the drainage for the lifetime of development and if so how is this secured and enforceable through the DCO?</p> <p>b) What would be the council's preferred adoption arrangements?</p>	1 2	<p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>SCC as LLFA do not adopt SuDS.</p> <p>In accordance with the SuDS adoption hierarchy, the option of Anglian Water (AW) adoption would be preferable, although we are not aware of the Applicants engaging in discussions with AW or whether AW would deem the SuDS on this development eligible for adoption.</p> <p>The only other feasible option is for the Applicants to take on the adoption themselves or appoint a management company on their behalf. Our expectation is for the Applicants to maintain the SuDS serving their substations. The SuDS serving the National Grid infrastructure and access road should be adopted and maintained by National Grid. This is on the basis that the National Grid infrastructure could remain on site beyond the lifetime of the EA1N & EA2 substations, thus if they were removed and the Applicants no longer had any infrastructure on site, it would not be appropriate for them to have responsibility for maintenance of SuDS serving the access road or National Grid substation.</p>

1.7.16	Applicant	Several RRs express concerns relating to recent flooding events in Friston. a) Has any work been undertaken to identify drains within the site?	1	2	<p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>The Friston Surface Water Management Plan, produced by SCC LLFA, identifies ordinary watercourses north of Friston. As highlighted in our response to 1.7.11, the submission contains contradicting statements on the extent of ordinary watercourses within the red line boundary and the potential project interface with these ordinary watercourses.</p>
1.8	Historic Environment				
1.8.12	HE and other parties including ESC	<p>Church of St Mary Your RR [RR-047] states you consider that the proposed developments would result in a very high level of harm to the significance of the grade II* listed Church of St Mary, and that you have concerns that the mitigation will bring about further changes to the setting of the church.</p> <ul style="list-style-type: none"> Do you consider that the location of the proposed substations and the proposed mitigation would cause substantial harm to the significance of this heritage asset? 	1	2	<p><i>ESC Lead Authority</i></p> <p>No - The Council does not consider the harm to be substantial but rather a high level of less than substantial harm. It is considered that substantial harm cannot arise from setting impacts on the significance of a designated asset and are much more likely to arise from direct physical impacts on the actual building, for example, the loss of key features or partial demolition or total demolition.</p>
1.8.13	Applicants, SCC, ESC	Parish Boundaries SCC and ESC consider that the proposed developments would result in the loss of the historic parish boundary between Friston and Knodishall and this has not been adequately addressed. The ExA note the responses of the Applicant to this point in their response to the RR [AS-036].	1	2	<p><i>ESC and SCC Joint Lead</i></p> <p>The design of the projects will result in the loss of this feature within the red line Order Limits. The significance of this feature and its relationship to the character of the site and locality, as well as its contribution to the setting of other heritage assets, is set out in detail in the LIR paragraphs 15.10-15.21 and in Appendix 1 of the LIR.</p>

		<ul style="list-style-type: none"> • How would the schemes overcome the loss of parish boundary PB1? Is it proposed to mitigate this loss? 		<p>Further design refinement work through the consolidation of infrastructure or commitment to the use of a GIS National Grid substation would provide the potential to reduce the degree or even avoid the loss of the historic parish/Hundred boundary.</p> <p>If its loss is found to be acceptable, archaeological investigations of the feature can be included in the detailed Written Scheme of Investigation (WSI) for mitigation, which at present is submitted as a high-level document, to be informed by further surveys.</p> <p>The Councils have also engaged with the Applicants regarding a package of compensatory measures identified for inclusion in a s111 agreement which would record and evaluate the historic landscape of the site and surroundings in detail and publish both academic and more popular outputs.</p> <p>These approaches offset to some degree the harm caused by the loss of this feature which in other circumstances (such as a housing development) would be incorporated into the design of the scheme and retained in situ as feature of the landscape and a public footpath (and private vehicular) right of way, albeit in a new context.</p>
1.8.16	Applicants, SCC	Onshore archaeology SCC [RR-007] note that the submitted level of information falls short of the level of information required by the County Archaeologist. The ExA note that engagement continues with the County archaeologists.	1 2	<p><i>SCC Lead Authority - Archaeology</i></p> <ol style="list-style-type: none"> 1. Comments have been sent on the Written Scheme of Investigation (WSI) and Outline Pre-Commencement Archaeology Execution Plan (OPCAEP) to the Applicants as part of the SoCG discussion which are considered appropriate to provide robust measures and draw attention to the Archaeology Appendix of the LIR for

		<p>The ExA note the responses of the applicants to this point of view in their responses to the RRs [AS-036] and the commitment to engage with the County Archaeologists to minimise potential impacts regarding buried archaeological remains.</p> <ul style="list-style-type: none"> • Outline additional necessary measures to be secured within the final Written Scheme of Investigation (Onshore) and pre-commencement archaeology execution plan 		<p>details. A key point is that there will not be a final WSI, but an Outline WSI with nested WSIs beneath it. The Applicants have said in the draft SoCG that ‘The Applicants have reviewed the Councils comments on the Outline Written Scheme of Investigation (WSI) and agreed to incorporate changes’. The revised documentation has not yet been reviewed so the comments are still valid.</p> <ol style="list-style-type: none"> 2. OPCAEP - Comments are provided in the Archaeology Appendix of the LIR, and required amendments identified to the OPCAEP are covered in more detail in the Archaeology SoCG and subject to further discussion with the Applicants. 3. Although not directly in the question asked by the Examiners, we have also recommended some changes to DCO wording, which needs to be raised in relation to changes to the WSI and OPCAEP as the DCO wording and the WSIs together form the provision for archaeological work and are interlinked. Suggested wording is also included in the Archaeology Appendix of the LIR to more accurately reflect likely stages of work. The Applicants have acknowledged comments, but we have not yet had any detailed discussion on revised wording. 4. We would also draw attention to points made in the LIR regarding the level of trial trenched archaeological evaluation and the implications for risks in deferring the planning of logistics for archaeological mitigation, particularly excavation, to post-consent, discussion of which is also reflected in the Archaeology SOCG.
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1.9	Land Use			
		No Questions		
1.10	Landscape and Visual Impact - The Applicant and respondent to these questions are referred to design and design mitigation questions raised in ExQ1.0 above as providing an element of the context for responses to these questions.			
1.10.2	Any Interested Party (IP) and the Applicants	<p>A number of RRs raise concerns about the visual impact of development on Friston, with reference to the adequacy of mitigation.</p> <ul style="list-style-type: none"> • Is further mitigation required and what form might this take? Would additional planting of trees and hedgerows be an appropriate method to resolve this? What form might additional planting take? 	1	<p>2 <i>ESC Lead Authority</i></p> <p>Given the size and location of the proposals relative to receptors it is not possible to fully mitigate the landscape and visual effects by planting. Additional planting has been considered, but there comes a point at which too much planting can have an adverse impact on prevailing landscape character, and erosive of the historic field boundary pattern that is found in the area between the substation site and Friston village.</p> <p>The timeliness of mitigation planting remains a significant concern. This relates principally to the question of growth rates as discussed at 1.2.75 and the related matters of; handling of onsite soils prior to planting, the management of the planting contract and procurement process, and the importance of the effective restoration of the site soil prior to planting. An exemplary approach by the Applicants in these areas is essential.</p> <p>If any further planting were considered, it would most appropriately be in the form of reinforcement of the existing field boundary hedgerow pattern and the addition of hedgerow trees. The Applicants have proposed advance planting within the red line and the Councils have requested a package of offsite planting as part of the emerging s111 agreement. This could introduce new hedge planting or gapping up closer to visual receptors to ensure more rapid visual mitigation for these locations prior to maturity of the on-site planting. However, any</p>

				<p>offsite planting is entirely in the gift of the relevant landowners and therefore the delivery of this planting will be a significant challenge for ESC. These matters are still being discussed between the Councils and the Applicants.</p> <p>Additional embedded mitigation could be secured through modifications to the design of the development as the outline of the scheme is refined. This would relate to both exploration of opportunities to minimise the size of the scheme footprint and height both pre-consent during the examination and post-consent during the procurement process. The use of a GIS rather than the AIS, as proposed in the applications would significantly reduce the footprint of the National Grid associated development by approximately two thirds. However, although visualisations of this option have been provided by the Applicants the impacts of this design have yet to be fully assessed through a LVIA and other assessments.</p>
1.11	Marine and Coastal Physical Processes			
1.11.9	SCC, ESC, Environment Agency (EA) Marine Management Organisation (MMO)	Coastal erosion predictions Do you agree with the conclusions on the extent of future coastal erosion set out in Appendix 4.6 [APP-447]?	1 2	<p><i>ESC Lead Authority</i></p> <p>Yes - The conclusions in the ES Appendix 4.6 report are based upon the Royal Haskoning DHV report: <i>'Sizewell Cliffs Landfall Site Review of Coastal Erosion Client: Scottish Power Renewables. Reference: I&BPB4842R001F0.1 Revision: 0.1/Final Date: 19 September 2017'</i> This report was updated by the RHDHV study</p>

				<p><i>'Sizewell Cliffs – EA2/EA1N Landfall - Review of Coastal Erosion Assessment of recent erosion data – implications on projected erosion lines. Client: Scottish Power Renewables Reference: PB4842I&BRP1806051516 Revision: 0.1/Final, Date: 12 July 2018'</i></p> <p>The revised report identified an increase in erosion rates in some areas.</p> <p>The Applicants have committed to using the updated coastal change risk information in the detailed design of the landfall infrastructure, including Transition Bay location, that will be submitted to ESC for acceptance in the LCMS.</p>
1.12	Marine Effects			
		No Questions		
1.13	Nuisance and other Public Health Effects - Further questions on this matter are reserved pending responses to questions on design in ExQ1.0, land use in ExQ1.9 and landscapes in ExQ1.10.			
		No Questions		
1.14	Other Projects and Proposals			
1.14.2	Office of Nuclear Regular (ONR), SCC, EDF Nuclear Energy Generation Ltd	Interface with Sizewell B Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell B nuclear licensed site operations, including emergency planning and on decommissioning activities? If not, please indicate the additional analysis and actions required.	1 2	<p><i>SCC Lead Authority - Emergency Planning</i></p> <p>SCC is not content that the ES adequately addresses the issue of interface affects with Sizewell B</p> <p><u>Major Accidents and Disaster Assessment</u></p> <p>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 introduced the requirement for Major Accidents and Disasters to be considered as part of the EIA process. The Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005 places a duties on Category 1 responders, including Suffolk County Council, to assess risks of emergencies,</p>

				<p>both natural and manmade, and to maintain emergency plans to mitigate, manage and control the effects of such emergencies to protect the public and the environment. There does not appear to be any reference to statutory civil contingency risk information nor has there been any consultation prior to these DCO applications with the Suffolk Local Resilience Forum to understand detailed local risk information and related emergency planning to allow an assessment of vulnerability to take place. There is reference to Control of Major Accident Hazard Regulations, but this is not appropriate in for this development unless the construction site is going to utilise hazardous materials that take operations into lower or upper tier status under these regulations. Accordingly, there is no description of measures to prevent or mitigate the significant adverse effects of such risks on the environment or details of the preparedness for and proposed response to such emergencies. This makes it difficult to understand whether the onshore construction activity has been properly assessed against the pre-existing civil emergency risks or if aspects of the construction activity itself may impact on pre-existing Suffolk emergency response arrangements.</p> <p>Additional requirements are also necessary to protect statutory emergency arrangements:</p> <ol style="list-style-type: none">1) No part of the preparation or construction works shall commence until emergency plans relating to these activities have been agreed and issued. Nuclear emergency plans cover the EDF Energy Sizewell B Operators emergency plan and the Suffolk County Council Off Site Emergency Plan issued under Radiation (Emergency Preparedness and Public Information) Regulations 2019. Wider civil contingency arrangements include
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				<p>Suffolk Resilience Forum emergency plans for identified risks issued under the Civil Contingencies Act 2004 that might affect the SPR construction sites and any associated infrastructure.</p> <p>2) The emergency plans shall be carried out as approved in relation to the relevant part of the relevant works, unless otherwise agreed after consultation through the Sizewell Emergency Planning Consultative Committee or Suffolk Resilience Forum as appropriate.</p>
1.14.3	ONR, SCC, NBB Generation (SZC) Ltd	Interface with Sizewell C Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell C proposed development, including construction, operation (including emergency planning) and decommissioning? If not, please indicate the additional analysis and actions required.	1 2	<p><i>SCC Lead Authority for Emergency Planning</i> – response as above 1.14.2.</p> <p><i>ESC and SCC Joint Lead</i> - The Sizewell C DCO was accepted by the Planning Inspectorate on 24 June 2020. The Applicants Cumulative Impact Assessments (CIA) in relation to Sizewell C in their ESs is not based on the DCO submission documents. The Councils understand that the Applicants will be submitting clarification notes to the Examining Authority to consider the new information. These updates are in relation to:</p> <ul style="list-style-type: none"> • Traffic and transport • Noise and vibration in relation to traffic and transport • Air Quality • LVIA • Tourism • Bats <p>Once this information has been provided the Councils will review the clarification notes and provide further comments.</p> <p>Please also see answer provided to Question 1.18.58.</p>

1.14.4	ONR, SCC, EDF Nuclear Energy Generation Ltd, NNB Generation (SZC) Ltd	Interface with nuclear construction, operation and decommissioning at Sizewell Are offshore works prospectively affecting the coralline crag sufficiently clearly described and controlled, given the protection to the Sizewell shore and to the nuclear sites afforded by it? If not, please indicate the additional analysis and actions required.	1	2	<p><i>ESC Lead Authority</i></p> <p>There is agreement in principle between the Councils and the Applicants on what further investigations are required by them to inform decisions on detailed design matters at the landfall site including the line of HDD seaward of the Transition Bay and the shore break out point location to avoid/minimise to an acceptable level potential disruption to Coralline Crag. The wording of the OCLMS requires the Applicants to submit this outstanding design information for review and approval by ESC. The extent of potential of impact on the Nuclear facilities of the landfall works is very small. The unresolved matters of design will not change this very low level of risk.</p>
1.14.5	SCC, ESC, SASES, SEAS, SoS, PCs and other IPs	Relevant projects and effects for cumulative impact assessment purposes: grid connections at Friston (OFHs 1 – 3, 7 – 9 October 2020) Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete list of projects in response, this question does not need to be responded to. However, if you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and	1	2	<p><i>ESC Lead Authority</i></p> <p>Please also note the response and details in relation to the projects the Councils have provided to 1.0.8.</p> <p>The Councils consider that the cumulative assessments with EA1N and EA2 should consider projects with connection offers to the National Grid substation proposed at Friston. The cumulative assessment should specifically consider the extensions required to the National Grid substation to accommodate the following project connections:</p> <ul style="list-style-type: none"> • Nautilus Interconnector – Webpage – https://www.nationalgrid.com/group/about-us/what-we-do/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus – Briefing Pack - https://www.nationalgrid.com/document/125601/download

		identify the public information source(s) from which you have made your assessment.		<ul style="list-style-type: none"> – FAQ document – Including details of maximum National Grid extension footprint for connection. https://www.nationalgrid.com/document/132456/download • Eurolink Interconnector – Webpage - https://www.nationalgrid.com/our-businesses/national-grid-ventures/interconnectors-connecting-cleaner-future – FAQ document – Including details of maximum National Grid extension footprint for connection. https://www.nationalgrid.com/document/132456/download • Galloper Extension/Five Estuaries Offshore Wind Farm – There is minimal information available in the public domain, but the Councils consider that National Grid could provide details of the land take required to connect a 353MW capacity offshore wind project to the National Grid substation. <p>The Councils maintain that as the National Grid substation is being considered as a strategic connection point for multiple projects, the effects of these connections on the design of the National Grid substation and associated impacts should be fully considered.</p>
1.14.6	All IPs	Relevant projects and effects for cumulative impact assessment purposes: other projects Are there any other projects that are not documented in the ES and are not grid connection projects at Friston	1 2	<p><u>ESC Lead Authority</u></p> <p><u>EA3 Offshore Windfarm</u></p> <p>Iberdrola, parent company to ScottishPower Renewables (SPR) has confirmed their intention to combine EA1N, EA2 and EA3 into one single delivery programme creating the East Anglia Hub</p>

		<p>(ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <ul style="list-style-type: none"> • Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant 	<p>https://www.iberdrola.com/about-us/lines-business/flagship-projects/east-anglia-hub-offshore-wind-complex).</p> <p>EA3 was consented in 2017 and comprises a 1.4GW offshore wind project. Landfall is at Bawdsey with a 37km cable route across to a substation at Bramford. The ducting for EA3 has been laid under the EA1 DCO consent.</p> <p>Sizewell C New Nuclear Power Station</p> <p>The Applicants have included the Sizewell C DCO in their ESs, however the information assessed within the CIA is based on the material EDF Energy published during the pre-application stage. The Applicants have committed to further assessing the cumulative impacts of the projects with Sizewell C now that additional information is available following submission of the Sizewell C DCO for examination. This further assessment is currently outstanding.</p> <p>The Sizewell C DCO submission documentation is available on the National Infrastructure Planning website https://infrastructure.planninginspectorate.gov.uk/projects/east-ern/the-sizewell-c-project/</p> <p>Projects for the Examining Authority to be aware of but the Councils consider there is insufficient information available at present for their inclusion in a cumulative impact assessment:</p> <p><u>Greater Gabbard Extension/North Fall Offshore Windfarm</u></p> <p>If a connection offer is provided for the Greater Gabbard Extension/North Falls Offshore Wind Farm at Friston during the</p>
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				<p>examination period, the consequence of this should be considered at this stage. Public information regarding the North Falls project is available from their website https://www.northfallsoffshore.com/. The Councils recognise that without a confirmed point of connection it would not be reasonable to ask the Applicants to consider this project in a cumulative assessment at the present time.</p> <p><u>SCD1 Link</u></p> <p>The NG-ESO Network Options Assessment January 2020 have recommended some network reinforcements as being necessary, including a subsea HVDC link between Sizewell and Canterbury (https://www.nationalgrideso.com/document/162356/download). National Grid Electricity Transmission (NGET) has confirmed that they will be taking forward this reinforcement suggestion within their Network Policy Decisions June 2020 (https://www.nationalgrid.com/uk/electricity-transmission/document/134036/download). There is insufficient information available at the present time to require the Applicants to include this project within their cumulative assessment. The Councils however wanted to bring this to the Examining Authority's attention, should further information be made available during the examination.</p>
1.15	Project Descriptions and Sites Selection - Further questions on this matter are reserved pending responses to questions in ExQ1.0, 1.6 and 1.14 above			
		No Questions		
1.16	Seascape, Landscape and Visual Amenity			
1.16.17	Applicants, SCC, ESC	Cumulative Effects SCC and ESC consider that cumulative effects and the visual effects of EA2 alone will result in	1	2 <i>ESC Lead Authority</i>

		<p>significant adverse landscape and long term adverse visual effects on the Suffolk Coast, including on the character and special qualities of the Suffolk Coast and Heaths AONB. Given the sensitivity and designation of seascape and landscape, in the view of the Councils the applicants have not demonstrably exhausted all reasonable mitigation measures in terms of design of scheme, including the proposed height of turbines.</p> <p>In response, the Applicant notes that the geographic extent of EA2 has been reduced and that they have demonstrated an ongoing commitment to reducing visual effects on the Suffolk coast [AS-036].</p> <p>To the Applicant:</p> <p>a) Could you elaborate on the statement “[t]he height of the wind turbines is dependent on multiple factors and requires balance between engineering constraints, environmental impacts and commercial viability”?</p> <p>To SCC, ESC:</p>		<p>Notwithstanding the height reduction and layout changes of the turbines offered to date, EA2 will continue to produce significant adverse impacts on the AONB that could be overcome by further modification of the scheme, such as a further reduction in the height of the turbines or layout modifications. We recognise that such modifications may have significant commercial impacts. However, given its proximity to the Suffolk Coast and Heaths AONB, all options should be considered to ensure that the scheme is designed to avoid significant adverse impacts upon the AONB. In terms of the precise height and layout that would achieve such an acceptable scheme, we defer to Natural England on this matter and will be guided by them.</p>
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		b) Respond to the above comments of the Applicant in their responses [AS-036], should you wish to do so.		
1.17	Socio-Economic Effects			
1.17.5	Applicants, SCC, ESC	<p>Memorandum of Understanding (MoU) A MoU is discussed to ensure a commitment for local authorities and the applicant to maximise education, skills and economic benefits of the projects. Such a MoU is welcomed by SCC.</p> <p>a) How would such an MoU be enacted, and would it be binding?</p> <p>b) Have means of securing it directly (through for example discharge of a requirement or conclusion of a Planning Obligation under the Town and Country Planning Act 1990) been considered and would they be necessary?</p> <p>c) Please update the ExA on the progress of the MoU. Have the New Anglia Local Enterprise Partnership been involved?</p>	1	<p>2</p> <p><i>SCC Lead Authority</i></p> <p>Response to a)</p> <p>The Memorandum of Understanding (MoU) establishes a commitment between SPR both as a developer and as a significant regional employer to work with the Councils to maximise the education, skills and economic benefits of the SPR's East Anglia Offshore Wind Projects.</p> <p>The MoU is not binding and relies upon the positive relationships that have been built between both parties since socio-economic work began on EA1 over 5 years ago.</p> <p>Response to b)</p> <p>We did consider all means of securing the commitments made in the MoU. However, we did not deem this necessary or achievable. We have had a positive relationship with SPR since the introduction of a Skills, Education and Employment MoU for EA3. Working with SPR outside of the formal planning process has promoted a collaborative relationship and we believe that we have achieved far more working together using the MoU than we did under the EA1 skills plan that was secured through the DCO.</p> <p>Through the MOU SPR have been able to enhance and enrich existing regional projects and priorities. The flexible nature of</p>

				<p>this process means that as our regional objectives change, as they have done with the challenges of Covid-19 recently, SPR are able to adapt and flex their support to ensure it is still relevant.</p> <p>Response to c)</p> <p>The NALEP are not a named signatory on the MoU. However, as we have said above, SPR work to enhance and enrich current and future regional objectives. These objectives derive from the wider strategic plans, such as the Norfolk & Suffolk Local Industrial Strategy, Energy Sector Skills Plan etc. These strategic plans involve input from many stakeholders not least NALEP.</p> <p>Positive progress continues with SPR, this is in the process of being formalised through regular diarised meetings of officers reporting against a standing agenda alongside biannual meetings as set out in the MoU.</p>
1.18	Transportation and Traffic			
	General			
1.18.3	SCC	<p>As highway authority you raise concerns in your RR [RR-007] about the following matters: - abnormal loads;</p> <p>- the mitigation measures proposed at the A12/A1094 Friday Street junction (40mph speed limit southbound on A12, rumble strips, repositioning of speed camera – a new roundabout is suggested);</p> <p>- the lack of planning obligations;</p> <p>- cumulative impacts;</p>	1 2	<p><i>SCC Lead Authority - Highways</i></p> <p><u>Abnormal Loads</u></p> <p>The Applicants have not addressed how large loads will access the substation site after completion. While the Department for Transport (DfT) have published a preferred route to Sizewell from Lowestoft this does not extend as far as Friston. Routing Abnormal Indivisible Loads (AILs) through Leiston contradicts the management of Heavy Goods Vehicles (HGVs) that are prevented to do so. It is also noted that the acquisition of land to facilitate</p>

		<ul style="list-style-type: none"> - the scoping out of operations, maintenance and decommissioning activities; - traffic movements; - mitigation compromising other schemes eg Sizewell C; and - Protective Provisions for SCC access as highway authority for inspection and maintenance. <p>Please expand on these concerns as they relate to highways:</p> <ul style="list-style-type: none"> a) giving more detail; b) explaining why and how they are attributable to each of the proposed projects; and c) specifying what in your view remains outstanding. 		<p>ALLs to use the A1094/B1069 junction is temporary and no permanent highway rights accrue.</p> <p>SCC considers that apart for the cost of any initial scoping meeting, consultancy services connected with the movement of ALL's within the County, the acquisition of data, specifications and technical approval for the commission noted above, to be outside the remit of our normal abnormal load management responsibilities, so would ask that our costs be reimbursed accordingly.</p> <p><u>Mitigation Measures at A12/A1094 Friday Street</u></p> <p>In summary, the DCO submissions set out that the Applicants' position was that, with management of the traffic of their employees and their proposed mitigation, their impacts at the junction are reduced from major adverse to minor adverse, which they consider to be acceptable. The Applicants also reach this conclusion for Scenario 1. The highway authority does not agree with this conclusion.</p> <p>The junction already has an existing high standard of signing including a speed enforcement camera, a reduced speed limit of 50mph and the visibility exceeds national guidance. The Councils are concerned about the effectiveness of the current speed limit as significant numbers (on average 1,711 annually over the last nine years) are still recorded by the enforcement camera as exceeding 50mph (note the camera is only present part of the year).</p> <p>The junction has a history of collisions, most notably relating to right turning vehicle movements across the A12 and it is</p>
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				<p>reasonable to assume that the proposed developments will further exacerbate these issues given the increase of right turn movements from A12 south to the A1094 for either project individually, with a peak daily increase of approximately 105 HGVs right turning at this location, as well as the light vehicles associated with staff. As set out by the Applicants within their DCO submissions, the proposed increased use risks a greater frequency and severity of collisions to the extent that it requires mitigation. The assessed increase in construction vehicle traffic is during the periods where the majority of collisions have occurred (i.e. across the daytime period).</p> <p>On top of the impacts of each individual project, there are the impacts of the cumulative two projects going ahead together (Scenario 1). Appendices 26.25 provide indicative traffic flow diagrams for the cumulative impact of the two developments, these are for the combined average day of the peak, and show, if all materials were from the south a peak impact of 452 daily movements (182 cars and 270 HGVs) at the junction.</p> <p>On average there is a potential increase in A12 South right turn manoeuvres to the A1094 from 20 seconds to 40 seconds in the AM peak hour for the one project on its own scenario and an increase of 32 seconds in the two-project scenario to a total of 52 seconds.</p> <p>Increased delay has the potential to lead to increased driver frustration and poor gap acceptance, increasing the likelihood of collisions.</p> <p>The highway authority remains of the opinion that the mitigation set out in the DCOs is not sufficient to mitigate the development impact as the area is already subject to comprehensive signing</p>
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				<p>and enforcement. The only significant alteration is the reduction in the speed limit, but it is clear from the existing situation that this in itself requires enforcement to be at least partially effective.</p> <p>For clarity, we are of the opinion that a 3-arm roundabout would be a solution, but that it is not the only solution at this location. We are also concerned about the potential for delivering one form of mitigation at this location only for it to be replaced by another alternative form should Sizewell C be permitted and begin construction; however, these issues are not easily reconcilable, and it is paramount for appropriate mitigation, especially when relating to road safety, to be delivered in all scenarios.</p> <p>As part of an ongoing workstream with the Applicants an average speed limit scheme was investigated; the Councils are of the opinion that a potential average speed camera scheme is likely to reduce speeds on the road and to be a more effective scheme than that proposed in the DCOs, and in isolation of the scheme's other impacts would reduce the rate of accidents. However, the increase in traffic, particularly right turning movements and additional HGVs is likely to increase the frequency if not the severity of crashes. The road safety data shows that speed in itself is not considered a factor, but poor driver behaviour or judgement is. This means that we cannot conclude that the Major Adverse impact would be sufficiently mitigated and is not in our view conducive in reducing this to a Minor Adverse impact.</p> <p>However, in continuation of this workstream a potential scheme involving a traffic signal arrangement discussed between the</p>
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				<p>parties has been indicated as acceptable mitigation by the highway authority, subject to relevant detailed design etc. It is understood now that this scheme is being proposed by the Applicants and on this basis the road safety impacts are considered to be capable of being mitigated to an acceptable level, subject to relevant detailed design and technical approvals.</p> <p>A more comprehensive technical note on the assessment of the historic road safety schemes can be provided, if helpful to the ExA.</p> <p><u>Planning Obligations</u></p> <p>While not the only option we consider that planning obligations are a suitable mechanism to agree a number of matters including</p> <ul style="list-style-type: none">• Traffic review group and monitoring (if not satisfactorily covered elsewhere). This could include review and implementation of Travel Plan• Highway maintenance and structural repairs (as Sizewell B dry store) and proposed in para 71 of the OCTMP• An implementation plan for highway works (if not included as a requirement)• Maintenance costs of highway mitigation such as average speed cameras or traffic signals and cost of any modification to permanent speed camera at Farnham• Technical approval of Highway Works (s278 agreements)• Order making where not included in the DCO (PRoW, Permanent speed limit changes)• Monitoring equipment for Stratford St Andrew AQMA• Costs of AIL management including structural assessments
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			<p><u>Cumulative Impacts</u></p> <p>At the time of submission, the information submitted was the best available to the Applicants and considered reasonable by the Highway Authority, assuming that it would highlight likely areas of concern, and on the assumption that it would be updated following the submission of Sizewell C DCO.</p> <p>The Applicants have agreed to provide additional assessment following the submission of the Sizewell C DCO; however, for clarity the Councils have not received this submission as yet, but are expecting to receive it in the near future and have had discussions with the Applicants on this matter.</p> <p>As the Sizewell C project could be delivered simultaneous with both or either EA1N or EA2, the cumulative impact is relevant to both projects.</p> <p>While scoping out of the worker trips during the operational phase is acceptable, we note that the transport impacts of the port related operations for construction and operation are assessed separately through a port travel plan. Works 35 to 37 are also to be assessed separately. This piecemeal assessment of the scheme makes it difficult to consider the full impacts of the scheme in its entirety.</p> <p><u>Scoping out of Operational, Maintenance and Decommissioning.</u></p> <p>In terms of workers trips for operational and maintenance reasons we accept these are few and unlikely to have a significant impact on the highway network. The Authorities main</p>
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				<p>concern is access to the substation site for HGV's and AILs during operation, maintenance and decommission. While numbers are likely to be small it is the nature of the route particularly through Leiston, Friston and the A1094/B1069 and B1122 junction that causes concern. These impacts are not considered nor those associated with the offsite highway improvements and port activities makes it difficult to assess the full impacts of these projects on the highway network.</p> <p><u>Traffic Movements</u></p> <p>At the time of submission, the Councils were concerned that without adequate controls the vehicle movements assessed for either project within the traffic and transport chapter of the ESs were only theoretical and could be subject to significant change, or at least day-to-day variance that could mean higher HGV numbers in particular. However, we would like to say that the level of detail provided by the Applicants on origin or movements provided within the submission was very helpful.</p> <p>Since submission, the Applicants have agreed that the Outline Construction Traffic Management Plan (OCTMP) and Outline Travel Plan (OTP) will include measures to control traffic flows to those assessed within Chapter 26 of the ESs, and as such they are considered acceptable following the relevant amendments to those documents being formally submitted by the Applicants, and agreement will be needed on the exact format of these controls. The Councils are of the view the controls should be agreed before any onshore preparation works commence.</p> <p><u>Mitigation Compromising Other Schemes e.g. Sizewell C; and</u></p>
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				<p>Throughout the process, the highway authority has needed to consider the potential implications of a number of scenarios relating to the delivery of other infrastructure; including:</p> <ul style="list-style-type: none">• Sizewell C• Brightwell Lakes• Strategic highway infrastructure on the A12 corridor <p>Brightwell lakes is large urban extension to the east of Ipswich on the SCC controlled part of the A12.</p> <p>Strategic infrastructure refers to the Major Road Infrastructure bids made to the Department for Transport for improvements to the A12 to the east of Ipswich and at Woodbridge to the north. It has consistently been the aim of the highway authority to minimise disruption of all the differing projects on each other; however, the highway authority is not in control of the phasing and delivery of a number of these projects and are limited by the same bidding processes for Central Government funding that all highway authorities must go through. Therefore, scope remains for significant interaction between construction works for projects.</p> <p>Most pertinently to the project, based on the timescales that applicants have submitted to the highway authority, reasonable potential exists for the following project interaction:</p> <ul style="list-style-type: none">• Sizewell C to be constructing a roundabout at A12/A1094 Friday Street during a period where the Applicants traffic requires to use this junction.• Brightwell Lakes planning permission to be undertaking works at 3 roundabouts at Martlesham or building their site access.
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				<ul style="list-style-type: none"> • Sizewell C to be constructing one of their numerous works on B1122 (Site access; Abbey Road junction; Green Rail route) during EA1N and EA2 construction. • The Applicants to be constructing their Lover’s Lane access. • Potential impact of any highway works at A12 Marlesford Bridge on construction traffic. • Delay for SPR HGVs associated with Sizewell C AILs. • Construction of the minor highway works on the B1122 and A1094 <p>It is important that all parties are willing to communicate throughout project delivery.</p> <p><u>Protective Provisions for SCC access as highway authority for inspection and maintenance.</u></p> <p>The Highway Authority is concerned that the powers of the DCO constrain its ability to discharge its duty under s41 of the Highways Act (1980), specifically to inspect and maintain the highway. We note that statutory utilities have protection for their apparatus, but similar provisions have not been made for the Highway Authorities apparatus.</p>
1.18.4	ESC	As LPA you raise concerns in your RR [RR-002] about the following matters: - abnormal loads; - the mitigation measures proposed at the A12/A1094 Friday Street junction (40mph speed limit southbound on A12, rumble strips, repositioning of speed camera	1 2	<i>SCC Lead Authority - Highways – please see above response to 1.18.3</i>

		<p>– a new roundabout is suggested); - the lack of planning obligations; - cumulative impacts; - the scoping out of operations, maintenance and decommissioning activities; - traffic movements; - mitigation compromising other schemes eg Sizewell C; and - Protective Provisions for SCC access as highway authority for inspection and maintenance. Please expand on these concerns as they relate to planning issues:</p> <p>a) giving more detail; b) explaining why and how they are attributable to each of the proposed projects; and c) specifying what in your view remains outstanding.</p>		
1.18.5	SCC and LPAs	<p>Notwithstanding the above, do SCC and the Local Planning Authorities agree with the methodology, baseline data and predicted traffic movements used to assess traffic and transport impacts in the ES? What, if any, are the outstanding issues?</p>	1 2	<p><i>SCC Lead Authority - Highways</i></p> <p><u>Methodology</u></p> <p>The Councils remain concerned about the methodology used for assessing some traffic impacts of the development within the ESs; these areas are summarised below and reflect our concerns about how the impact is felt by the individual.</p> <p>1. Severance – the changes in traffic flows required to result in a change in impact are large, being 30%; and represent</p>

				<p>a coarse tool for identifying changes. The methodology has been derived from studies of major changes in traffic flow and so needs to be treated with caution. There is evidence that community severance can occur with relatively small changes in traffic and that perception of severance can be affected by environment meaning that 'generic' figures may not be appropriate.</p> <ol style="list-style-type: none">2. Amenity – The assessment of changes in amenity are based on locations where traffic flows double. Clearly this can require a significant change in traffic flow and the highway authority consider it to be a coarse assessment method. Increased traffic flows can lead to changes in perception, suppressed walking trips, perceptions in danger and in some cases a 50% change in traffic flow might be more impactful than a 200% change.3. Fear and Intimidation – the assessment of Fear and Intimidation appears to be included within the assessment of amenity and does not appear to utilise the criteria of changes in average hourly traffic flows (albeit that the highway authority would have concerns with this method was it to be used without caution). <p>However, it is recognised that the Applicants' methodology is consistent with many other environmental assessments of traffic impacts and is not specifically criticising them for using this approach. However, the methodology has its limitations which means that significant impacts may occur that are not being identified, albeit the temporary nature of traffic associated with the development also needs to be considered as well.</p> <p>The Councils are also of the opinion that the assessments do not fully consider what the accumulative impact of the number of</p>
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				<p>different impacts e.g. severance, amenity, road safety etc) might be collectively to a community. No consideration is given to whether a number of minor adverse impacts collectively represent a moderate or major adverse impact to an individual.</p> <p>The methodology used for all other areas in the ESs is considered acceptable.</p> <p><u>Baseline Data</u></p> <p>The highway authority is content that the baseline data submitted is acceptable.</p> <p><u>Predicted Traffic Movements</u></p> <p>At the time of submission, the Councils were concerned that without adequate controls that those vehicle movements assessed within the traffic and transport chapter of the ESs were only theoretical; albeit the level of detail submitted in the DCOs by the Applicants was very helpful.</p> <p>However, the Applicants have agreed that the OCTMP and OTP will include measures to control traffic flows to those assessed within the Chapter, and as such they are considered acceptable on this basis, and we await formal submission of these updated documents, for which the exact format of controls will need to be agreed.</p> <p><u>Outstanding Issues:</u></p> <p>The following outstanding issues remain:</p>
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					<ul style="list-style-type: none"> • Agreement that the methodology used would fully identify the environmental impacts associated with transport. • Formal submission of updated OTP and OCTMP and agreement on the methods of control. • Formal submission of the traffic signal solution at A12/A1094 Friday Street.
	ES Chapter 26 Traffic and Transport (APP-074)				
1.18.9	Applicants and SCC	<p>Paragraph 136 says that you have agreed with SCC that the road safety review “should examine the rate of collisions per length of road in miles ...” and in paragraph 137 you say that “Collision rates have been calculated in billion vehicle miles ...”.</p> <p>It is not clear where the methodology of assessing collisions per length of road in miles originates.</p> <p>a) Please explain. b) Does the highway authority have a view?</p>	1	2	<p><i>SCC Lead Authority - Highways</i></p> <p>The highway authority is content with the method used, as it has been used for indicative purposes and assessment has also been undertaken of collision clusters separately (as requested in July 2018 ETG meeting). The review of the rate of collisions against national data was useful to identify sections of highway where the frequency of crashes to enable a more data led assessment of road safety. A similar approach is taken to County wide safety assessment of major roads and in the Sizewell C Transport Assessment. The highway authority however remains mindful that, along with other areas of assessment within the ES, the method of assessment is still reliant on professional judgement and so has considered the applicants review against our own knowledge of local collision history.</p>
1.18.19	Applicants, SCC	<p>Paragraphs 18 and 19 mention temporary alterations to the highway (listed in Table 26.2) and that it is anticipated that these would be completed before construction starts on the relevant section of the cable route.</p>	1	2	<p><i>SCC Lead Authority - Highways</i></p> <p>With regards to works at the A12/A1094 junction and the A1094/B1069 junction</p>

		<p>Please</p> <p>a) explain why and under what circumstances construction might start before completion of these alterations;</p> <p>b) state for how long these temporary alterations would be needed; and</p> <p>c) confirm that there are no other offsite locations which in your view would require highway improvements in connection with this project.</p>		<p>a. The highway authority does not envisage any situation where these works would not be completed prior to HGV movements using the A1094.</p> <p>b. It is assumed that they would be needed for the duration of both projects.</p> <p>With regards to Marlesford Bridge</p> <p>a. Limited detail has been provided on the nature of these works; however, it is assumed that they would be needed prior to the AILs using this route. The Council would require assurance that any works required will not unduly impact the local highway network being mindful of the lack of suitable diversion routes for large vehicles and the likelihood of Sizewell traffic already using this route.</p> <p>With regards to the requirement for wider works:</p> <ul style="list-style-type: none"> • If the main operational access to the substation site is to be via the A1094/B1121 junction this junction should be assessed for the turning movements of large vehicles and associated impacts on road safety. This junction is on a bend, in a dip making EB left turning movements difficult. • The highway authority is not aware of any other locations that would require physical works for them to be suitable to accommodate larger vehicles for site construction. • There are a number of locations on the A12 where the increase in traffic during construction would have a noticeable detrimental impact on highway capacity. <p>The Councils are aware that the definition of onshore preparation works includes creation of the highway accesses, footpath creation and highway alterations but that the CoCP and associated management plans are not required to be finalised</p>
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				before commencement of construction. While the Councils welcome early delivery of this work it considers that the same controls should apply to the preparation works as for the main element of construction. The DCOs as submitted requires the final CTMP and CTP to be submitted prior to commencement, potentially after the pre commencement works are undertaken.
1.18.46	SCC	<p>In Table 26.24 it says that collision cluster 3 at the junction of A12 and A1094 (links 2,3 and 6) is expected to experience a 49% increase in HGV (Table 26.24) and the Applicant considers that “the change in HGV traffic could potentially lead to significant impacts” in terms of road safety, assessing the impact as major adverse (paragraph 294).</p> <p>The Applicant further notes in paragraph 296 that it is “unclear at this stage whether the Sizewell C New Nuclear Power Station proposals would come forward or be delivered prior to the commencement of construction” of this project, and proposes an independent set of physical mitigation measures (paragraphs 297 and 298) for the A12/A1094 junction complemented by the control of employee traffic movements as outlined in the OTP [APP-588] (paragraph 300).</p>	1 2	<p><i>SCC Lead Authority - Highways</i></p> <p>For confirmation; it is assumed that the ‘proposed mitigation’ referred to in this case is that proposed as part of this application (i.e. EA1N and EA2). However, in order to cover all scenarios both have been commented on below.</p> <ol style="list-style-type: none"> 1. Sizewell C mitigation would be sufficient to mitigate impacts at this junction for both EA1N and EA2 in isolation or combined; however, the highway authority does not have the powers nor the funding to ensure delivery of this mitigation prior to the EA1N or EA2 projects being delivered. 2. With regards to the Applicants’ proposals, the proposals to reduce the southbound A12 speed limit to 40 mph at the Friday Street A12/A1094 junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate in the Local Highway Authority’s professional opinion to avoid an increase in collisions. However, the discussed temporary traffic signal scheme is considered acceptable. <p>With regards to traffic trends, as more recent road safety information is available for the junction now, it is appropriate to consider as part of any conclusions that are reached.</p>

		<p>a) Bearing in mind that the Sizewell C project has now been accepted for examination, do you consider that the proposed mitigation at the A12/A1094 junction is adequate?</p> <p>b) Do you think that the downward trend of collisions at the A12/A1094 junction is a reliable basis for the assessment?</p>		<p>SCC have reviewed the crashes recorded at this site between October 2014 and September 2019 (inclusive) and considered this information in its comments.</p> <p>It is clear that a pattern of collisions remains, and it would be debateable to simply omit the previous year's collisions data given that no improvements have occurred at the junction since this time. The reduction could be as a result of a number of factors or just down to statistical variation and we remain cautious on this basis.</p> <p>The recent decrease in collisions is noteworthy and has been considered by the highway authority, but we retain our previous position on this matter. It is noticeable that there has been limited growth in traffic at this location and this application will create a significant increase, particularly in larger vehicles.</p>
1.18.58	SCC	<p>In paragraphs 349 to 352 the applicant lists and describes briefly the three assessment scenarios presented by the Sizewell C project in its PEIR, namely</p> <ul style="list-style-type: none"> i) Early years, a three year period commencing 2022; ii) Peak construction (road option); and iii) Peak construction (rail option) <p>Paragraph 353 then lists three cumulative impact assessment scenarios, combining the East Anglias scenario 1 (construction of both the East Anglia projects simultaneously) with each of the</p>	1 2	<p><i>SCC Lead Authority - Highways</i></p> <p>With regards to the cumulative assessment; at the time of submission we were satisfied that the level of assessment was reasonable on the basis that it would be updated to reflect Sizewell C project details once the DCO was submitted.</p> <p>The Applicants have agreed to provide additional assessment following the submission of the Sizewell C DCO; however, the Councils have not received this submission as yet, but are expecting to receive it in the near future and have had discussions on this matter with the applicant.</p> <p>The Applicants' assessment should review the cumulative impact of Sizewell C, in particular the change to an integrated transport</p>

		<p>three Sizewell C New Nuclear Power Station project options, namely</p> <ul style="list-style-type: none"> i) early years, ii) peak construction (rail option) and iii) peak construction (road option). <p>In paragraph 354 the Applicant states that “The Stage 4 consultation document ... does not contain sufficient information to facilitate a quantitative assessment.”.</p> <ul style="list-style-type: none"> • Please advise whether or not you are satisfied with the three cumulative impact assessment scenarios listed in paragraph 353. If you are not satisfied, please explain why. 		<p>strategy in the submitted DCO rather than a rail or road led strategy presented by EDF in the stage 3 consultation. Until this information is presented the Councils cannot accept that the cumulative impacts have been adequately assessed.</p> <p><u>Outstanding Issue</u> Revised cumulative impact of Sizewell (as submitted in the DCO), EA1N and EA2 to be submitted by the Applicants and reviewed</p>
1.18.60	Applicants, EDF Energy (SZC New Nuclear), SCC	<p>Paragraphs 359 to 367 refer to highway improvements proposed in relation to the Sizewell C New Nuclear Power Station project, which it is not currently envisaged will be available prior to construction work starting on this East Anglia project.</p> <ul style="list-style-type: none"> • Given that the Sizewell C New Nuclear Power Station project has been accepted for examination, have any discussions been held between the Applicant, EDF Energy and the highway authority in relation to ways in which these improvements could be ready for use 	1 2	<p><i>SCC Lead Authority - Highways</i></p> <p>With regards to the delivery of the Sizewell C mitigation; consideration has been given to the delivery of Sizewell C mitigation. However, it is not envisaged that EDF would forward fund their mitigation prior to having an investment decision on their project.</p> <p>It would be beneficial to have this mitigation in place as early as possible to mitigate cumulative impacts as well as to avoid potentially short-term works associated with EA1N and EA2 potentially being replaced by the Sizewell C mitigation shortly after delivery; however, the scale of mitigation is not considered reasonable for the EA1N and EA2 projects in isolation. It is also of note, that the Sizewell C mitigation in both cases requires the</p>

		<p>prior to work commencing on the East Anglia ONE North and East Anglia TWO project(s) in order to reduce cumulative impacts?</p>		<p>purchase of land outside of the control of the Applicants, being outside of their red line, and outside of the control of the highway authority and so would require relevant powers to be granted or agreements to be in place to construct the mitigation; which has not currently been evidenced to be necessary should the Sizewell C development not come forward.</p> <p>EDF have provided an implementation plan as part of their submission which indicates delivery of:</p> <ul style="list-style-type: none"> • The Sizewell Link Road within two and a half years of start of the project. • The Two Village Bypass within two years of start of project. <p>And it is expected that the A12/A1094 junction would be one of the first items of mitigation that EDF would deliver; however, we cannot guarantee either if or when their project would commence construction.</p> <p>As set out above, further review of the cumulative impacts will be undertaken following submission of the Applicants' technical review and in those locations where a cumulative impact occurs but mitigation is not delivered in the Early Years Scenario, it would be reasonable to seek sufficient controls or mitigation to mitigate those short-term impacts.</p> <p>With regards to phasing the largest concerns are associated with the delivery of the A12/A1094 roundabout junction which forms mitigation for the Sizewell C development. The lack of control of the phasing of these projects means that a number of scenarios exists where that junction is or is not delivered adding significant problems for the highway authority.</p>
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				<p>While the Highway Authority has liaised with the Applicants and EDF separately regarding delivery of highway mitigation no joint meeting has been held between all three applicants other than to discuss transport modelling and cumulative traffic impact.</p> <p>The Highway Authority's principal objective is that all applicants co-ordinate their mitigation works so that they are delivered in a timely manner to alleviate the impacts and to minimise disruption to road users.</p> <p>Note: The Highway Authority also desires co-operation between applicants to effectively monitor and enforce controls across the projects.</p>
	Outline Travel Plan			
1.18.65		<p>Paragraph 50 defines a breach of the final Transport Plan and paragraph 52 outlines the three stages proposed for the Transport Plan enforcement process.</p> <ul style="list-style-type: none"> • As highway authority, are you content with these proposals? 	1	<p>2 <i>SCC Lead Authority - Highways</i></p> <p>The defined breaches in paragraph 50 are acceptable, however, it is assumed that these can be reviewed and if necessary, amended through mutual agreement through the structure proposed in plate 1.1. This structure should reflect the co-operative relationship with other concurrent NSIPs and should not prevent Highway Stakeholders corresponding with the Applicants on relevant matters.</p> <p>The Councils seek assurance that the measures within the Travel Plan also apply to workers with vans provided for their work.</p> <p>The three enforcement stages in paragraph 52 are acceptable.</p>

					Note that we have comments to make on the control measures, monitoring and enforcement embedded within all management plans.
	Outline Access Management Plan				
1.18.70	SCC	<p>Section 2.2 sets out the design of the proposed accesses (paragraphs 2228) and section 2.3 deals with crossing design (paragraphs 29-36). It is intended that technical approval is obtained post consent. The ExA note that a Stage 1 Safety Audit was completed in July 2019 and is appended at Annex 2.</p> <ul style="list-style-type: none"> • As highway authority, do you have any concerns about any of the proposed accesses or the associated traffic management arrangements? 	1	2	<p><i>SCC Lead Authority - Highways</i></p> <p>The Councils accept that the design of the temporary access is acceptable in principle pending detailed technical agreement. There are some minor outstanding matters such as visibility for the B1069 access (Access 9) where the visibility splay includes and are outside the red line and highway boundary. Acceptance at this stage is subject to the necessary removal of trees and hedges being acceptable in planning terms.</p> <p>The Authority notes the lack of centreline on the B1121 highlighted in problem 10 may be due to carriageway widths less than 5.5m when centre lines should not be used (Traffic Signs Manual Chapter 5). Other than this item the road safety audits are acceptable provided the measures recommended in Annex 2 are resolved during design.</p> <p>The Councils are content that the detailed traffic management for highway works and access construction can be agreed during the technical approval of these works. The Councils have sought assurance that Sizewell Gap will not be closed to prevent access to Sizewell at any time. In table 26.4 the Applicants clearly state that no road to be fully closed to install cables under the public highway. Assurance is required that roads will not be closed for other reasons.</p> <p>Clarity is required regarding the legislation to be used to implement temporary speed limits necessary for the accesses as</p>

				<p>the powers under the Road Traffic Regulation Act (1984) are restricted to a maximum duration of 18 months.</p> <p>The Highway Authority questions why a temporary speed limit is necessary for Access 13 during the temporary works but not when it is a permanent access as there are no material differences between either layout.</p>
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Appendix A – E-mail between Innogy and Leiston Town Council regarding Galloper Extension Offshore Wind Farm

From: [REDACTED]
Sent: 21 October 2019 15:04
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Galloper Extension Offshore Wind Farm update

Hello John,

Thanks for your prompt reply. This will certainly be treated as a project in its own right. Although it is at a very early stage we do expect to give it its own project name in due course and it will go through a separate planning process which will include public and statutory consultation on potential design options (which we expect to have in 2020). We do expect the project will require an onshore substation to be built. We currently have an offer from National Grid to connect in to Friston which we are considering but have not yet accepted and the offer is subject to consent being received for Scottish Power's DCO application for the East Anglia projects.

Our consents team are also contacting various other council officers with a view to ensuring they're engaged at an early stage in the discussions around the development.

I hope this is of some help. I'd be happy to call you or ask Tom to, if that is of further help?

Thanks

Rebecca

Rebecca Neal

Public Relations Manager

Innogy Renewables UK Limited

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