East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Written Representations

Volume 2: Technical Stakeholders

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to East Anglia ONE North and East Anglia TWO

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Glossary of Acronyms

AEoI	Adverse Effect on Integrity
AEZ	Archaeological Exclusion Zone
AIS	Air Insulated Switchgear
AJA	Adrian Jamies Acoustics Limited
ANO	Air Navigation Order
AON	Apparently Occupied Nests
AONB	Area of Outstanding Natural Beauty
AW	Anglian Water
AWG	Anglian Water Group
BEIS	Department for Business, Energy & Industrial Strategy
BGS	British Geological Survey
BMV	Best and Most Versatile
BoR	Book of Reference
CfD	Contract for Difference
CHC	Cultural Herritage
CIA	Cumulative Impact Assessment
CJEU	Court of Justice of the Euopean Union
CoCP	Code of Construction Practice
CPO	Civil protection Order
DCO	Development Consent Order
DEPONS	Disturbance Effects of Noise on the Harbour Porpoise Population in the North Sea
DML	Deemed Marine Licence
DMO	Destination Mangement Organisation
EA1	East Anglia ONE
EA1N	East Anglia ONE North
EA2	East Anglia TWO
EA3	East Anglia THREE
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
EPS	European Protected Species
ES	Environmental Statement
ESC	East Suffolk Council
ESO	Energy Systems Operator
ETG	Expert Topic Group
ExA	Examining Authority
FFC	Flamborough & Filey Coast
FID	Final Investment Decision
FLCP	Fisheries Liaison and Co-existence Plan
FRA	Flood Risk Assessment
FWC	Friston Water Course
GIS	Gas Insulated Switchgear
GPA	Good Practice Advice
GLVIA	Guidelines for Landscape and Visual Assessment
HDD	Horizontal Directional Drill
HE	Historic England
HGV	Heavy Goods Vehicle
HIA	Hydrological Impact Appraisal
HRA	Habitats Regulation Assessment
HSE	Health and Saftey Executive
IAQM	Institute of Air Quality Management
ICE	Institute of Chartered Engineers
IDB	Internal Drainage Board

IGE	Institute of Gas Engineers
IP	Interested Party
iPCOD	Interim Population Consequences of Disturbance Model
ISH	Issue Specific Hearing
kV	Kilovolts
LAT	Lowest Atronomical Tide
LCT	Landscape Character Type
LLFA	Lead Local Flood Authority
LMP	Landscape Management Plan
LVIA	Landscape and Visual Impact Assessment
MHWS	Mean High Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
NDA	Nuclear Decomissioning Authority
NE	Natrual England
NGET	National Grid Electricity Transmission
NG	National Grid
NGG	National Grid Gas
NGV	National Grid Ventures
NOx	Nitrogen Oxide
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
OLEMS	Outline Landscape and Ecological Management Strategy
OLMP	Outline Landscape Management Plan
ONR	Office for Nuclear Regulation
OS	Ordinance Survey
OSL	Optically-Stimulated Luminescence
OWF	Offshore Wind Farm
PAD	Protocol for Archaeological Discoveries
PDA	Proposed Development Area
PEIR	Preliminary Environmental Information Report
PIDs	Public Information Days
PRoW	Public Rights of Way
RAG	Red Amber Green
REPPIR	Radiation (Emergency Preparedness and Public Information) Regulations
RR	Relevant Representation
RSPB	Royal Society for the Protection of Birds
RSPCA	Royal Society for the Protection of Crultey to Animals
RTD	Red Throated Diver
SASES	Substation Action Save East Suffolk
SAC	Special Area of Conservation
SBP	Sub-Bottom Profilier
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeology Service
SCHAONB	Suffolk Coast and Heaths Area of Natural Beauty
SIP	Site Integrity Plan
SLVIA	Seascape, Landscape and Visual Amenity
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPR	ScottishPower Renewables
SPS	Suffolk Preservation Society
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
SZC	Sizewell C
TCE	The Crown Estate

TWT	The Wildlife Trust
UK	United Kingdom
UXO	Unexploded Ordnance
WIA	Water Impact Assessment
WR	Written Representation
WSI	Written Scheme of Investigation

Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.

Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Monitoring buoys	Buoys to monitor *in situ* condition within the windfarm, for example wave and metocean conditions.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission plc
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.
Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.

Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre–planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.

1 Introduction

1. The Applicants' comments on Written Representations (WR) received from Interested Parties (IPs) for the East Anglia ONE North and East Anglia TWO offshore windfarms ('the Projects') have been separated into separate Volumes, as discussed in ***Volume 1*** (ExA.WR_1.D2.V1).

2. This Volume presents the Applicants' comments on Written Representations received from IPs which the Applicants have engaged with as part of the Statement of Common Ground (SoCG) process. The Applicants' comments on these Written Representations have been provided in ***section*** *Error! Reference source not found.* below.

3. Regarding responses to Natural England's WR, these are provided in document reference: ExA.AS-10.D2.V1.

4. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

2 Comments on Technical Stakeholders Written Representations

2.1 Anglian Water

ID	Written Representation	Applicants' Comments
	1. Introduction 1.1 Anglian Water Services Limited ("Anglian Water") is appointed as the water and sewerage undertaker for the Anglian region, by virtue of an appointment made under the Water Industry Act ("WIA") 1991. Anglian Water is a wholly owned subsidiary of AWG plc. The principal duties of a water and sewerage undertaker are set out in the WIA. 1.2 Anglian Water is considered a statutory consultee for the proposed offshore windfarm under section 42 of the Planning Act (2008) and Regulation 3 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009. 1.3 Anglian Water is the appointed water and sewerage undertaker for the development. 1.4 Anglian Water has engaged as an Interested Party in the Examination in order to ensure adequate provisions are included within any final Development Consent Order to protect Anglian Water's existing and future assets and Anglian Water's ability to perform its statutory duties. 1.5 Anglian Water is in principle supportive of the development.	No further comment.
	2. Anglian Water's Interests and Assets affected Existing Assets Affected 2.1 There are a number of water recycling assets in Anglian Water's ownership located within the boundary of the onshore cable for the proposed offshore windfarm. These assets are critical to enable us to carry out Anglian Water's duty as a sewerage undertaker.	The Applicants agree further discussion will be required regarding the proposed design of any crossings of Anglian Water (AW)'s existing assets within the onshore cable route.

ID	Written Representation	Applicants' Comments
	2.2 In relation to the water recycling assets within the boundary of the Development Control Order, having laid the asset under statutory notice, Anglian Water would require the standard protected easement widths for these assets and for any requests for alteration or removal to be conducted in accordance with the Water Industry Act 1991 and the Protective Provisions sought by Anglian Water (outlined in section 3). Set out below is the standard easement width requirements; 2.3 Standard protected strips are the strip of land falling the following distances to either side of the medial line of any relevant pipe; ·2.25 metres where the diameter of the pipe is less than 150illimetres, ·3 metres where the diameter of the Pipe is between 150 and 450 millimetres, ·4.5 metres where the diameter of the Pipe is between 450 and 750 millimetres, ·6 metres where the diameter of the Pipe exceeds 750 millimetres. 2.4 If it is not possible to avoid any of Anglian Water's water recycling assets, then the asset may need to be diverted in accordance with Section 185 of the Water Industry Act 1991. Anglian Water is, pursuant to Section 185 under a duty to divert sewers if requested to do so unless it is unreasonable to do so. A formal application will need to be made to Anglian Water for a diversion to be considered. Diversionary works will be at the expense of the applicant. 2.5 Anglian Water expects to have further discussion with the applicant regarding the proposed design of any required crossings of Anglian Water's existing assets within the onshore cable route.	There are protective provisions in the ***draft DCO*** (APP-023) in respect of AW. These will ensure the Applicants can carry out the Projects and AW's assets will be protected, and AW can continue to carry out its duty as a statutory duty as a sewerage undertaker.
	Connections to the water supply/ foul and surface water sewerage networks 2.6 Anglian Water is currently in discussion with East Anglia TWO Limited in relation to connections to the water supply and public sewerage network. We understand that a connection to the water supply network and a connection to the public sewerage network is expected to be required for the onshore project substation with final requirements to be	No further comment.

ID	Written Representation	Applicants' Comments
	confirmed post consent. Details of the required connections are not included with the application documentation. 2.7 We have recommended that further advice be sought from Anglian Water in relation to the above requirements and would wish to reserve the right to comment on any further information provided by East Anglia TWO Limited as part of the examination process. 2.8 Should a water supply or wastewater service be required, and once agreement has been reached, there are a number of applications required to deliver the necessary infrastructure. These are outlined below: 2.9 Once agreement has been reached, there are a number of applications required to deliver the necessary infrastructure. These are outlined below: Provision of infrastructure: Water Section 51a Water Industry Act 1991 Onsite Foul water Section 104 Water Industry Act 1991 Offsite Foul water Section 104 Water Industry Act 1991	
	3. Draft Development Consent Order 3.1 Anglian Water has had constructive dialogue with the applicant regarding the wording of protective provisions specifically for the benefit of Anglian Water to be included in the Draft Development Consent Order (DCO).The DCO as currently drafted incudes protective provisions specifically for the benefit of Anglian Water (Schedule 10, Part 3) as previously requested. 3.2 Therefore, we are supportive of the wording of the protective provisions included in the Draft DCO as submitted.	No further comment.
	4. Statement of Common Ground with Anglian Water	The Applicants will continue to work to agree the content of a Statement of Common Ground with AW.

ID	Written Representation	Applicants' Comments
	4.1 Anglian Water is currently in discussion with East Anglia Two Limited in relation to the content of a Statement of Common Ground in relation to the above project. It is expected the Statement of Common Ground once agreed will be submitted by East Anglia Two Limited to the Examining Authority on behalf of both parties.	

2.2 AONB Partnership

ID	AONB Partnership Written Representation	Applicants' Response
0	The AONB Partnership's comments relate to both EA1N and EA2 unless specified.	Noted
1	<u>The Landscape and Visual Impact of the scheme on the nationally designated AONB, including its setting.</u> The applicant acknowledges that there will be significant negative impacts on the defined characteristics of the AONB during the construction of the cable route. The AONB partnership diverge from the opinion of the applicant that this should be characterised as localised as the AONB Partnership consider the AONB to be a single entity and that damage to one part of the nationally designated landscape compromises the AONB as a whole. It is not appropriate to use 'localised' as a descriptor under these circumstances. The AONB Partnership is further concerned that the applicants assertion that the onshore cable route construction is short term and temporary does not fully reflect the anticipated time scales of multiple cable routes as necessary for the delivery of two projects that may run concurrently and impacts will be felt by the AONB for a period of years potentially and this must be considered as the worst-case scenario and mitigation, or if not possible, compensation be adequate in recognition of these significant impacts. The AONB Partnership acknowledges that once operational the effects of the landfall and onshore cable route would be not significant due to their presence underground.	The Applicant considers it good practice to assess the geographical (or spatial) extent over which landscape effects occur. GLVIA3 (Landscape Institute, 2013)[1] notes in para 5.50 that *'The geographical area over which the landscape effects will be felt must also be considered. This is distinct from the size or scale of the effect – there may for example be moderate loss of landscape elements over a large geographical area, or a major addition affecting a very localised area'.* The use of the term 'localised' is considered appropriate as a descriptor since the effects on the defined characteristics of the AONB during the construction of the cable route were assessed as occurring at the site level within the cable route itself, or its immediate setting within the Estate Sandlands LCT between Thorpeness, Sizewell and Leiston (referred to as Area A of the AONB in the LVIA (APP-077)). Short-term landscape effects were defined and agreed with the Expert Topic Group (ETG) as being effects of 1 to 4 years in duration, which is appropriate for the project alone assessments. Medium-term landscape effects (5-10 years) were assessed for the cumulative construction effects of the East Anglia TWO and East Anglia ONE North onshore cable routes, under Scenario 2 (consecutive construction) due to the longer duration of construction activities in that scenario. The Applicants note, with regards duration of effects of the onshore cable route, that the effects will be perceived from close range during short

[1] Landscape Institute with the Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition.

ID	AONB Partnership Written Representation	Applicants' Response
		periods of peak construction activity when there have been changes to the landcover and there are active construction works occurring. Between these short periods of peak construction activity of the onshore cable route construction, there will be periods when there is very little construction activity except during the 12 months landfall construction in section 1 of the onshore cable route. The key, ongoing changes along the onshore cable route would be to the landform, as a result of topsoil mounds which would be seeded, covered or fenced; and the landcover, through the removal of vegetation and the replacement of a section of it with the haul road. Such changes would only be distinguishable from the current land use at very close 'or localised' range. The Applicants agree that that once operational, the effects of the landfall and onshore cable route would be not significant due to their presence underground. As outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information will be provided at Deadline 3. Regarding other mitigation measures to be implemented within the AONB, these are considered in the OLEMS (APP-584) and will be reflected in the final LMP to be submitted post consent and which must accord with the OLEMS. The Applicants will submit an updated ***OLEMS***

ID	AONB Partnership Written Representation	Applicants' Response
		(into the Examination at Deadline 3 reflecting any changes resulting from discussions with stakeholders since submissions of the Applications. The Applicants are currently in discussion with the Councils with regard to s111 agreements. These discussions include potential support for measures applicable to the AONB.
2	The impact of the scheme on the defined natural beauty elements of the AONB, including landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage. For EA2 the AONB Partnership note that the applicant acknowledges that two of the six defined characteristics of natural beauty of the AONB, landscape quality and scenic quality will suffer significant long-term effect. The AONB Partnership acknowledge that these impacts are reversable but suggest that with the anticipated lifespan of the windfarm being 25 years, these impacts are long term, particularly with the likelihood of a re-charge for an additional 25 years. In relation to the proposed embedded mitigation scheme for EA2, the AONB Partnership would draw on its expert advice from Alison Farmer Associates https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/EA2-SLVIA-Mitigated-Layout-Review-Final-Report-20200416.pdf which concludes: Whilst the SLVIA [Seascape, Landscape and Visual Impact Assessment] for the mitigated scheme shows a reduction in effect from viewpoints due to reduced lateral spread, this does not alter the fact that when taken in association with EA1N and Galloper, Greater Gabbard, EA2 will continue to cause a substantial 'curtain' effect of turbines on skyline views from the AONB and would not conserve and enhance its special qualities.	We confirm that the Applicant's SLVIA (APP-076) has assessed that the significant effects identified for the operational phase of the East Anglia TWO project (EA2) would be long term. In relation the advice the AONB Partnership has received from Alison Farmer Associates, the Applicants acknowledge that there would be some visual and cumulative interaction in views of the skyline between the operational Galloper and Greater Gabbard windfarms, the East Anglia ONE North project (EA1N) and EA2, however it should be noted that the distances between the coastline and the windfarms ensures that it is unlikely that all of the windfarms would be readily visible at any one time from locations within the AONB and that from many locations there are substantial gaps between these existing windfarms and the East Anglia TWO and East Anglia ONE North windfarm sites. The Applicants do not agree that there would be a substantial 'curtain' effect. This is largely due to the mitigation included for EA2 which has successfully addressed the key concern raised by Natural England during section 42 consultation, by effectively removing the possibility that a 'curtaining' effect would be apparent (where views of the horizon could be obscured) in views from the coastline of the AONB. The Applicants note that Natural England are in agreement that the potential for this 'curtaining' effect has been mitigated.

ID	AONB Partnership Written Representation	Applicants' Response
	Therefore, the AONB Partnership accepts that there is no mitigation for this impact and seeks maximum compensation in relation to the residual impact arising from the offshore elements of EA2.	The Applicants have committed to a reduction in the maximum tip height of wind turbines from 300m to 282m following discussions with the supply chain on the turbines likely to be available for installation at the Projects. This reduction reduces the magnitude of impact on the AONB. The Applicants are currently in discussion with the Councils with regard to s111 agreements. These discussions include potential support for measures applicable to the AONB.
3	<u>The impact of the scheme on the defined special qualities of the nationally designated AONB, including health and wellbeing, community, economy and ecosystems goods and services.</u> The AONB Partnership recognise the special qualities of the AONB as defined in the Natural Beauty and Special Qualities document, see https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/05/V1.8_Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf It notes what the applicant has to say on this subject in 6.3.28.4 Appendix 28.4 of the Landscape Assessment : *The 'Special Qualities' of the AONB identified in Section 3.0 of this document are considered somewhat intangible for the purpose of assessment of seascape, landscape and visual effects, often considering factors which are related to, but are not specifically 'landscape' quality criteria, such as health and well-being, family heritage, food culture and tourism.* THE AONB Partnership consider that the defined special qualities of the AONB such as health and well-being, community, economy, ecosystem goods and services are likely to be impacted by the development, particularly during the construction phase such as:	The Applicants note that for the purposes of the SLVIA/LVIA, Natural England and the AONB Partnership were in agreement that the assessment of the effects on special qualities should be based on the 'Natural Beauty Indicators' as set out in Section 2 of the SCHAONB Natural Beauty and Special Qualities document. The Natural Beauty Indicators for the SCHAONB presented, are structured to follow Natural England's guidance for assessing landscapes for designation as a National Park or AONB in England. Potential disruption to access of the AONB with respect to recreation and public rights of way (PROW) is assessed in ***section 30.6.1.4*** of Chapter 30 (APP-078). Impacts on these receptors were considered in the context of the potential for reduced water and air quality; increased noise; traffic delays; and changes to the landscape. The assessment concluded impacts to be of negligible significance in EIA terms. In addition, an ***Outline PRoW strategy*** (APP-581) has been submitted with the DCO application which secures the management of PRoWs. Also, A ***PRoW Clarification Note*** (REP1-049) was submitted at Deadline 1. This note summarises the assessment undertaken regarding PRoW in the ES.

ID	AONB Partnership Written Representation	Applicants' Response
	• Access to certain parts of the AONB will be affected impacting health and well-being. • Construction activity will impact communities in a number of ways – noise, disturbance, disruption etc. • Tourism, a key economic driver in the AONB, will be adversely impacted; and • Construction has the potential to impact the public good gained from ecosystem services that might include products such as food and clean water, regulation of floods, soil erosion and disease outbreaks, and non-material benefits such as recreational and spiritual benefits in natural area. The AONB Partnership therefore expects appropriate mitigation and where not possible, compensation in relation to the adverse impacts on the special qualities of the AONB.	Noise impacts are assessed separately in ***Chapter 25*** (APP-073) and concluded impacts of negligible to minor adverse significance in EIA terms. Human health impacts are assessed separately in ***Chapter 27*** (APP-075) and concluded that impacts would be not significant. Impacts on tourism receptors are assessed in ***Chapter 30*** (APP-078) and concluded impact significance of negligible adverse to major beneficial in EIA terms for the various impacts assessed. In addition, the Applicants prepared a ***Socio-Economics and Tourism Clarification Note (SZC CIA)*** which was submitted at Deadline 1 (REP1-036). This note revisits the CIA with regard to the potential impacts upon tourist accommodation during construction and cumulative impacts upon the labour market during construction when the Projects and SZC are considered together. As outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information will be provided at Deadline 3. Regarding other mitigation measures to be implemented within the AONB, these are considered in the ***OLEMS*** (APP-584) and will be reflected in the final LMP to be submitted post consent and which must accord with the OLEMS. The Applicants will submit an updated ***OLEMS***

ID	AONB Partnership Written Representation	Applicants' Response
		to the Examination at Deadline 3 reflecting any changes resulting from discussions with stakeholders since submissions of the Applications. The Applicants are currently in discussion with the Councils with regard to s111 agreements. These discussions include potential support for measures applicable to the AONB.
4	The impact of the scheme on the purposes of the nationally designated AONB, including its setting, to conserve and enhance natural beauty. The AONB has a statutory purpose to conserve and enhance natural beauty. The AONB appointed consultant, Alison Farmer Associates, concludes in the report *SLVIA [Seascape landscape and Visual Impact Assessment] Review EA2 and EA1N Final Report* that can be downloaded from https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/SLVIA-Review-EA2-and-EA1N-Final-Report-.pdf that: *Wind turbines are not a special quality of the Suffolk Coast & Heaths AONB nor a key characteristic, and the proposed development would not further the purpose of designation. On the contrary, the proposed developments, either individually or cumulatively, would undermine the special qualities and perceptions which are a fundamental component of this nationally valued landscape.* Compensation for the adverse impact the wind turbines will have on the special qualities of the AONB must be appropriate to the level of identified impact.	The Applicants note that whilst they may not be a special quality or key characteristic of the SCHAONB, operational wind turbines are a component part of the offshore setting of the SCHAONB as noted in Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators V1.8 Version Date 21 November 2016[2]. They are listed as factors influencing Landscape Quality and Relative Wildness under the heading 'Suffolk Coast and Heaths AONB Indicator' in Table 2. The Applicant has assessed in the SLVIA for EA2 that there would be some significant effects on special qualities of the SCHAONB as follows: Paragraph 332: *'No physical attributes that contribute to the special qualities of the AONB will be changed as a result of the construction and operation of the offshore infrastructure. The East Anglia TWO windfarm site, due to its location at some distance outside the AONB, only impacts on the perception of certain special qualities and these are aspects of landscape and scenic quality, relative wildness and tranquillity. The effect resulting from the East Anglia TWO windfarm site is assessed as significant (but of medium, rather than high magnitude) on the perception*

[2] LDA Design, (2016). Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators V1.8 Version Date 21 November 2016. Available at: https://www.eastsuffolk.gov.uk/assets/Planning/Adastral-Park/Environmental-Statement-Volume-2b-appendices/Appendix-H6-Suffolk-Coast-and-Heaths-AONB-Natural-Beauty-and-Special-Qualities-Indicators-November-2016.pdf

ID	AONB Partnership Written Representation	Applicants' Response
		of specific landscape, scenic and relative wildness qualities that derive from changes to views from the AONB out to sea from geographically focused areas along the immediate coastal edges of the AONB where these panoramic, long distances views offshore are an aspect of some of the special qualities. The effects on the big 'Suffolk Skies' are assessed as not significant'. Paragraph 333: '*The construction and operation of the offshore infrastructure will result in a relatively low change to the strong character of the AONB, with its varied and distinctive landscapes continuing to define its overall character. It is not the overall character or physical features of the coastal edges of the AONB that will be changed, but to some degree the specific aesthetic/perceptual aspects of its character from localised areas of the coast where there are interactions between these aesthetic/perceptual aspects of the sea and the East Anglia TWO windfarm site. These effects arise as a result of change on some particular characteristics, not a change to all of the characteristics since the majority of elements, features and aesthetic/perceptual aspects will continue to contribute to the character and distinctiveness of the AONB and will not be changed or affected in the same way. The perception of most of the other AONB special qualities and key characteristics will remain unaffected by the construction and operation of the offshore infrastructure'*. However, the Applicants do not agree that this degree of change '*would undermine the special qualities and perceptions which are a fundamental component of this nationally valued landscape'*.

ID	AONB Partnership Written Representation	Applicants' Response
		The Applicants are currently in discussion with the Councils with regard to s111 agreements. These discussions include potential support for measures applicable to the AONB.
5	How the scheme and the applicant has addressed its duty of regard to the purposes of the AONB. The AONB Partnership recognise and welcome the applicant seeking to locate the proposed associated substation outside the nationally designated landscape, although recognise the concerns of those who are likely to be impacted by the proposals. However, the offshore elements of the development will impact on the purposes of the AONB. In relation to the proposed embedded mitigation scheme for EA2, the AONB Partnership would draw on its expert advice from Alison Farmer Associates https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/EA2-SLVIA-Mitigated-Layout-Review-Final-Report-20200416.pdf which concludes: *Whilst the SLVIA [Seascape, Landscape and Visual Impact Assessment] for the mitigated scheme shows a reduction in effect from viewpoints due to reduced lateral spread, this does not alter the fact that when taken in association with EA1N and Galloper, Greater Gabbard, EA2 will continue to cause a substantial 'curtain' effect of turbines on skyline views from the AONB and would not conserve and enhance its special qualities.* Therefore, as stated previously, the AONB Partnership accepts that there is no mitigation for this impact and seeks maximum compensation in relation to the residual impact arising from the offshore elements of EA2.	The Applicants note that the AONB Partnership welcomes that the proposed substation is proposed to be located outside the AONB. The Applicant considers that the siting of the onshore substation demonstrates its duty of regard to the purposes of the AONB. The Applicants acknowledge that the offshore elements of the development will have some impact on the setting of the AONB and some of its special qualities. In relation to the advice the AONB Partnership has received from Alison Farmer Associates, the Applicants acknowledge that there would be some visual and cumulative interaction in views of the skyline between the operational Galloper and Greater Gabbard windfarms, East Anglia TWO and East Anglia ONE North, however it should be noted that the distances between the coastline and the windfarms ensures that it is unlikely that all of the windfarms would be readily visible at any one time from locations within the AONB and that from many locations there are substantial gaps between these existing windfarms and the East Anglia TWO and East Anglia ONE North windfarm sites. The Applicants do not agree that there would be a substantial 'curtain' effect. This is largely due to the mitigation included for EA2 and which has successfully addressed the key concern raised by Natural England during section 42 consultation, by effectively removing the possibility that a 'curtaining' effect would be apparent (where views of the horizon could be obscured) in views from the coastline of the AONB. Natural England

ID	AONB Partnership Written Representation	Applicants' Response
		are in agreement that the cumulative 'curtaining' effect has been mitigated. With regards to the Statutory Purpose of the AONB, the Applicants would refer the ExA to its '***Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy***' submitted at Deadline 2 (document reference ExA.AS-5.D2.V1). In essence, the Applicants have had regard to the purposes of the AONB through the siting and design of the Projects in order to minimise landscape and visual effects on the SCHAONB and avoid compromising the purposes of the SCHAONB designation. The Applicants are currently in discussion with the Councils with regard to s111 planning agreements. These discussions include the potential support for measures applicable to the AONB.
6	<u>The impact of the scheme on the ability of residents and visitors to enjoy the purposes of the AONB, its natural beauty and special qualities, for example public access and enjoyment of countryside.</u> The AONB Partnership considers that the enjoyment of the nationally designated landscape by residents and visitors is critical. It defers to the statutory Highway Authority (Suffolk County Council) to ensure access via the public rights of way network is maintained to the highest possible standard. However, it considers that public enjoyment of the AONB will be compromised by the offshore elements. The Alison Farmer Associates report commissioned by the AONB Partnership, SLVIA [Seascape landscape and Visual Impact Assessment] Review EA2 and EA1N Final Report that can be downloaded from https://www.suffolkcoastandheaths.org/wp-	The Applicants note that whilst they may not be a special quality or key characteristic, operational wind turbines are a component part of the offshore setting of the SCHAONB as noted in Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators V1.8 Version Date 21 November 2016. They are listed as factors influencing Landscape Quality and Relative Wildness under the heading 'Suffolk Coast and Heaths AONB Indicator' in Table 2. The Applicants have assessed in the SLVIA for the East Anglia TWO windfarm that there would be some significant effects on special qualities of the SCHAONB as follows: Paragraph 332: '*No physical attributes that contribute to the special qualities of the AONB will be changed as a result of the construction and operation of the*

ID	AONB Partnership Written Representation	Applicants' Response
	content/uploads/2020/10/SLVIA-Review-EA2-and-EA1N-Final-Report-.pdf concludes that: Wind turbines are not a special quality of the Suffolk Coast & Heaths AONB nor a key characteristic, and the proposed development would not further the purpose of designation. On the contrary, the proposed developments, either individually or cumulatively, would undermine the special qualities and perceptions which are a fundamental component of this nationally valued landscape. Therefore, as stated before, the AONB Partnership accepts that there is no mitigation for this impact and seeks maximum compensation in relation to the residual impact arising from the offshore elements of EA2.	*offshore infrastructure. The East Anglia TWO windfarm site, due to its location at some distance outside the AONB, only impacts on the perception of certain special qualities and these are aspects of landscape and scenic quality, relative wildness and tranquillity. The effect resulting from the East Anglia TWO windfarm site is assessed as significant (but of medium, rather than high magnitude) on the perception of specific landscape, scenic and relative wildness qualities that derive from changes to views from the AONB out to sea from geographically focused areas along the immediate coastal edges of the AONB where these panoramic, long distances views offshore are an aspect of some of the special qualities. The effects on the big 'Suffolk Skies' are assessed as not significant'*. Paragraph 333: '*The construction and operation of the offshore infrastructure will result in a relatively low change to the strong character of the AONB, with its varied and distinctive landscapes continuing to define its overall character. It is not the overall character or physical features of the coastal edges of the AONB that will be changed, but to some degree the specific aesthetic/perceptual aspects of its character from localised areas of the coast where there are interactions between these aesthetic/perceptual aspects of the sea and the East Anglia TWO windfarm site. These effects arise as a result of change on some particular characteristics, not a change to all of the characteristics since the majority of elements, features and aesthetic/perceptual aspects will continue to contribute to the character and distinctiveness of the AONB and will not be changed or affected in the same way. The perception of most of the other AONB special qualities and key characteristics will remain unaffected by the construction and operation of the offshore infrastructure'*.

ID	AONB Partnership Written Representation	Applicants' Response
		While it is assessed in the SLVIA that there would be some residual significant effects on the views obtained by people from the coastal edges of the SCHAONB as a result of the East Anglia TWO windfarm site, the Applicant considers that the East Anglia TWO project has achieved the aim stated in NPS EN-1 to design sensitively and has had due regard to the purposes of the SCHAONB. The East Anglia TWO windfarm site, which gives rise to the significant effects, is not within the AONB but is a considerable distance outside it. The impacts have been appropriately mitigated through siting and design and the residual effects, albeit that there are some residual significant effects on the seascape aspects of the Special Qualities from a limited number of locations within the AONB, do not compromise the reasons for designating the AONB and do not harm or undermine its integrity. Furthermore, it should be noted that the East Anglia ONE North assessment concluded no significant landscape and visual effects on the SCHAONB, an assessment with which Natural England are in agreement, therefore the Applicant does not agree that *'the proposed developments, either individually or cumulatively, would undermine the special qualities'.* Clearly, the East Anglia ONE North windfarm, individually, would not undermine the special qualities of the SCHAONB. Chapter 30 (APP-078) provides a detailed summary of existing PRoWs and cycle paths in the locality of the Projects and addresses the potential impacts on PRoWs. In addition, an ***Outline PRoW strategy*** (APP-581) has been submitted with the DCO application which secures the management of PRoWs. Also, A ***PRoW Clarification Note*** was submitted at Deadline 1. This note summarises the assessment undertaken regarding PRoW in the ES.

ID	AONB Partnership Written Representation	Applicants' Response
7	The impact of the scheme on the local economy, in particular the tourism industry, that relies on the natural beauty and special qualities of the AONB. The AONB Partnership does not accept the applicant conclusion that: *The construction impact is assessed as having major beneficial significance for local businesses and people working for them as summarised in Table 30.66. The long term impact on tourism is assessed as having negligible significance for the tourism industry within the Suffolk Coast AONB [sic].* This does not recognise that tourism is a significant driver of the economy in the AONB, worth £228M and supporting over 5,000 jobs. 2020 study using 2019 figures see https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/Suffolk-Coast-Heath-AONB-Report-2019.pdf The potential impacts of various energy projects impacting on the Suffolk Coast as outlined in the Suffolk Coast Limited Destination Management Organisation and AONB funded study at https://www.thesuffolkcoast.co.uk/shares/The-Energy-Coast-BVA-BDRC-Final-Report-2019.pdf which reports that 29% of people interviewed would be a lot or less likely or visit the area and could cost the tourism industry £24M. Appropriate mitigation in the form of a Tourism Fund is required to enable identified bodies such as the Suffolk Coast Limited, Destination Management Organisation to mitigate the adverse impacts on tourism arising from this project.	The Applicants maintain that the conclusions of the assessment in ***Chapter 30*** (APP-078) are appropriate and based on a comprehensive assessment which is summarised below. Regarding tourism, Appendix 30.2 (APP-571) reviewed 24 studies undertaken from 2002 until 2017, 16 UK based and eight reports from outside of the UK for comparison. The majority of these studies focussed on tourist's perception of windfarms and how this would affect their likelihood of revisiting the area. One study focussed specifically on major infrastructure constructed by the National Grid undertaken in 2014. In addition, Biggar Economics have undertaken a study considering changes in visitor behaviour or spending in other areas where there has been offshore windfarm development provided in the ***Tourism Impact Review*** (REP1-102). This analysis found no relationship between the construction of the offshore windfarms and visitor spending and tourism employment trends in the studied areas , for either designated landscapes or other coastal areas. The conclusion of the Review was that during construction of comparable offshore windfarms, the study districts did not experience worse performance in employment in the accommodation and food services sector than the wider region, and broadly, any changes in employment during construction periods were in line with employment levels in the wider region. The Applicants have also prepared a ***Socio-Economics and Tourism Clarification Note (SZC CIA)*** which was submitted at deadline 1 (REP1-036) This note revisits the CIA with regard to the potential impacts upon tourist accommodation during construction and cumulative impacts upon the labour market during construction when the Projects and SZC are considered together.

ID	AONB Partnership Written Representation	Applicants' Response
		The Applicants are currently in discussion with the Councils with regard to a tourism fund which would not form part of the Applications.
8	<u>The quality of and appropriateness of measures to avoid, mitigate and compensate for impacts on the natural beauty and special qualities of the AONB.</u> The AONB Partnership considers that if the developments go ahead then compensation payments would be required in addition to the embedded mitigation of the proposed scheme (layout of offshore infrastructure and undergrounding of cables through the AONB). Any compensation and mitigation funds should seek to meet the aspirations of the statutory AONB Management Plan. Such funds should reflect the impacts caused by the development during the construction, operation and decommissioning on the AONB. The AONB Partnership considers that compensation and mitigation funds should include representatives of the AONB Partnership in any decision making processes of how those funds are distributed. The AONB Partnership considers that the development proposals would cause significant harm to the nationally designated landscape.	The SLVIA recognises that EA2 results in some significant effects on the perception of panoramic offshore views from parts of the AONB coastline, however the Applicant considers that the Project will not result in harm to the statutory purposes of the AONB. The Applicants would refer the ExA to its ***'Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy'*** (document reference ExA.AS-5.D2.V1). In essence, the Applicants have had regard to the purposes of the AONB through the siting and design of the Projects in order to minimise landscape and visual effects on the SCHAONB and avoid compromising the purposes of the SCHAONB designation. The Applicants are currently in discussion with the Councils with regard to s111 planning agreements. These discussions include the potential support for measures applicable to the AONB.

2.3 Cadent Gas

ID	Written Representation	Applicants' Comments
	1 INTRODUCTION 1.1 Cadent Gas Limited ("Cadent") is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, Central and North West England. Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient and coordinated way. 1.2 Cadent has made a relevant representation in this matter which was accepted as a late representation on 17 February 2020 in order to protect apparatus owned by Cadent. Cadent does not object in principle to the development proposed by the Promoter. 1.3 Cadent has two medium pressure mains located within the highway (B1353) (Plot 46) a low pressure main in Aldeburgh Road, B1122 (Plot 57) which would be protected under the NRSWA framework, however, it also has a medium pressure gas pipeline which may require diversion subject to the impact (located within Plot 27, 28, 29) and a low pressure gas main within the footpath and track on the Sizewell Estate (Plot 52). Cadent also has a low pressure main in the private road Fitches Lane (Plot 62). Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits need to be maintained at all times and access to inspect such apparatus must not be restricted. 1.4 Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent has been liaising with the Promoter in respect of potential impacts to its apparatus however an adequate form of protective provisions has yet to be agreed, to which see further at paragraph 3. 1.5 Cadent need to ensure appropriate land rights are available for any diversion of their assets sitting outside the adopted highway boundary and will require consent to be granted where there are proposals to work within the easement strip of any existing Cadent's Apparatus.	The Applicants are continuing to progress discussions with Cadent with a view to reaching agreement on Protective Provisions to be included within the DCO.

ID	Written Representation	Applicants' Comments
	1.6 Cadent is holder of a licence under Section 7 of the Gas Act 1986 and operates four gas distribution networks in North London, Central England (West and East) and the North West. 1.7 Cadent is required to comply with the terms of its Licence in the delivery of its statutory responsibilities. It is regulated by the Network Code which contains relevant conditions as to safe transmission of gas and compliance with industry standards on transmission, connection and safe working in the vicinity of its Apparatus, to which see paragraph 2. REGULATORY PROTECTION FRAMEWORK 2.1 Cadent require all Promoters carrying out Authorised Development in the vicinity of their Apparatus to comply with: (a) TSP/SSW/22 - Safe Working in the vicinity of Cadent's High Pressure Gas Pipelines; (b) ICE (institution of Gas Engineers) recommendations IGE/SR/18 Edition 2 Safe Working Practices to Ensure the Integrity of Gas Pipelines and Associated Installations, and (c) the HSE's guidance document HS(G)47 Avoiding Danger from Underground Services. 2.2 The industry standards referred to above have the specific intention of protecting: (a) the integrity of the pipelines and thus the distribution of gas; (b) the safety of the area surrounding gas pipelines; (c) the safety of personnel involved in working with gas pipelines. 2.3 Cadent requires specific protective provisions in place for an appropriate level of control and assurance that the industry regulatory standards will be complied with in connection with works in the vicinity of Cadent's Apparatus.	

ID	Written Representation	Applicants' Comments
	3 PROTECTIVE PROVISIONS 3.1 Cadent seeks to protect its statutory undertaking, and insists that in respect of works in close proximity to their Apparatus as part of the authorised development the following procedures are complied with by the Applicant: (a) Cadent has had the opportunity to review and consent to the plans, methodology and specification for works within 15 metres of any Apparatus, works which will adversely affect their Apparatus or otherwise breach distances/guidance set out in paragraph 2 above. (b) DCO works in the vicinity of Cadent's's apparatus are not authorised or commenced unless protective provisions are in place preventing compulsory acquisition of Cadent's land or rights or overriding or interference with the same. 3.2 Cadent maintain that without an agreement or qualification on the exercise of unfettered compulsory powers or its Apparatus the following consequences will arise: (a) Failure to comply with industry safety standards, legal requirements and Health and Safety Executive standards create a health and safety risk. (b) Any damage to Apparatus has potentially serious hazardous consequences for individuals/property located in the vicinity of the pipeline/apparatus if it were to fail. (c) Potentially significant consequences arising from lack of continuity of supply; 3.3 Insufficient property rights have the following safety implications: (a) Inability to retain the apparatus resulting in an inefficient network and loss of supply.	

ID	Written Representation	Applicants' Comments
	(b) Inability for qualified personnel to access apparatus for its maintenance, repair and inspection. (c) Risk of strike to pipeline if development occurs within the easement zone in respect of which an easement/restrictive covenant is required to protect the pipeline from development. (d) Risk of inappropriate development within the vicinity of the pipeline increasing the risk of the above. 3.4 The proposed Order does not yet contain fully agreed Protective Provisions expressed to be for the protection of Cadent to Cadent's satisfaction, making it currently deficient from Cadent's perspective nor does it address fully how property rights will be made available for the diversion of Cadent's assets to their satisfaction where compulsion, rather than agreement with a third party land owner is necessary. 3.5 Cadent contend that it is essential that these issues are addressed to their satisfaction to ensure adequate protection for their Apparatus and that Protective Provisions on their standard terms are provided. 3.6 The standard form of the Protective Provisions which Cadent seek appear at the Appendix to this Representation]. [The text highlighted in yellow remains in dispute]. 3.7 The generic protective provisions aimed at protecting water, electricity and gas are not adequate for the protection of Cadent's operations. Cadent is required to comply with the terms of its Licence in the delivery of its statutory responsibilities. It is regulated by the Network Code which contains relevant conditions as to safe transmission of gas and compliance with industry standards on transmission, connection and safe working in the vicinity of its Apparatus. Damaging a water main and damaging a gas main have very different consequences and Cadent's protective provisions reflect the nature of its apparatus. 3.8 It is essential that Protective Provisions on Cadent's standard terms are agreed and included in the Order or a side agreement. The standard form of the Protective Provisions	

ID	Written Representation	Applicants' Comments
	which Cadent seek and which are being discussed with the Promoter appear at the Appendix to this Representation. 3.9 We will continue our discussions with the Promoter but should it not be possible to agree the Protective Provisions then Cadent may wish to be attend a Compulsory Acquisition Hearing or Issue Specific Hearing. Cadent reserve the right to provide further written information in advance in support of any detailed issues remaining in dispute between the parties at that stage once they have received a substantive response from the Promoter.	

2.4 EDF Nuclear Energy Generation – Sizewell B

ID	Written Representation	Applicants Comment
001	In preparing our response it has come to our attention that the Book of Reference may not correctly reflect the affected Owners for Plots 19, 20, 21 and 33. The Order Limits shown on the Land Plans appear to run down the centre of field boundaries with the result that the red colour extends into NGL land interests on the north side of Sizewell Gap Road in relation to Land Parcels 19, 20, 21 and 33. We request the Applicant provides written confirmation as regards the extent of Land Parcels 19, 20, 21 and 33. Following this confirmation we request that the Land Plans and the Book of Reference are updated to clarify the extent to which EDF Energy Nuclear Generation Limited's land interest is affected. We also bring to the ExA's attention errors in Additional Submission document AS-037 `Applicant's Comments on Relevant Representations Volume 4: Landowners', which in response to RR-038 (Page 3), lists EDF Nuclear Energy Generation Ltd as having an interest in plot numbers 28, 29, 30, 31, 35, and 39 (in relation to the October 2014 Option Agreement). We understand that EDF NNB Generation Company (SZC) Limited are the beneficiary of this options agreement rather than NGL.	In response to the question relating to the Land Plans and plots 19, 20, 21 and 33, the Applicants can confirm the following in respect of each plot – All of Plot 19 is classed as publicly maintainable highways adopted by Suffolk County Council as the Highways Authority. As the owner of adjoining land and pursuant to the *ad medium filum* rule EDF Energy Nuclear Generation Limited have been named as owners in respect of the subsoil beneath the public highway to the halfway point. Plot 20 forms part of Suffolk County Council's registered freehold title SK336067 and the Applicants are not aware of any interests, rights or restrictions in favour of EDF Energy Nuclear Generation Limited. Plot 21 forms part of Suffolk County Council's registered freehold title SK336067 and the Applicants are not aware of any interests, rights or restrictions in favour of EDF Energy Nuclear Generation Limited. All of Plot 33 is classed as publicly maintainable highways adopted by Suffolk County Council as the Highways Authority. As the owner of adjoining land and pursuant to the *ad medium filum* rule EDF Energy Nuclear Generation Limited have been named as owners in respect of the subsoil beneath the public highway to the halfway point. The Applicants can confirm that the plots referred to do not extend into EDF Energy Nuclear Generation Limited land interests to the north of Sizewell Gap Road as the plots either comprise land within the adopted highways or are within private ownership of another party. With regards to EDF Energy Nuclear Generation Limited's comments in respect of Plots 28, 29, 30, 31, 35 and 39, the Applicants thank EDF Energy Nuclear Generation Limited for clarifying the position. This was

ID	Written Representation	Applicants Comment
		an error but for the avoidance of doubt EDF Energy Nuclear Generation Limited is not listed as an interested party in the Book of Reference in respect of these plots.

2.5 Environment Agency

ID	Written Representation	Applicants' Comments
01	Whilst we were broadly satisfied with the level of assessment and mitigation measures proposed as part of the application, the main focus of discussions with the applicant has been to ensure that an appropriate level of assessment is undertaken and informs the detailed design and implementation of the proposed scheme. It is our view that adequate processes have been proposed to enable this to happen for issues within our remit.	No further comment.
02	**Marine & Coastal Physical Processes** 1.1 We have confirmed within the draft Statement of Common Ground that we have no concerns regarding issues within our remit in respect of this aspect of the scheme. We have also responded to question 1.11.9 of the Examining Authority's first written questions (ExQ1), to confirm that we have no cause to question the conclusions presented on the extent of future coastal erosion. 1.2 We would however emphasize the importance of ensuring that East Suffolk Council, as the lead coastal protection authority for this section of the coastline, are satisfied with this aspect of the proposals.	No further comment.
03	**Ground Conditions and Contamination** 2.1 We confirmed in our Relevant Representation that we were generally satisfied with the embedded mitigation measures proposed to protect groundwater laid out in Document 6.1.18, Table 18.2. The applicant has confirmed through the draft SoCG that the Code of Construction Practice (CoCP) (draft DCO Requirement 22) will incorporate provisions to deliver this mitigation along the cable route and at the substation site, and that the Environment Agency will be consulted on the relevant sections as	No further comment.

ID	Written Representation	Applicants' Comments
	requested. In respect of this issue, those sections will include hydrogeological risk assessments (HRA) undertaken as specified below; and groundwater protection method statements as part of the pollution prevention and response plan. Also included for consultation with the Environment Agency are the draft site waste management plan and the materials management plan. This is to be confirmed in an updated Outline CoCP, 2.2 In respect of works at the landfall, the detailed HRA and methods to prevent groundwater contamination are to be included in the Landfall Construction Method Statement (draft DCO Requirement 13). The applicant has confirmed in the draft SoCG that we will be consulted during the preparation of this document.	
04	**Flood Risk** 3.1 Our Relevant Representation highlighted that the land proposed to be used as a construction laydown area for the bridge strengthening works at Marlesford (Work No. 37), was within Flood Zone 3 (high risk), with the majority being Flood Zone 3b (functional floodplain). Although the proposed works are likely to be considered 'Essential Infrastructure', and therefore not inappropriate at this location, we were concerned that any built development or land raising could increase the risk of flooding elsewhere and that risk may not be capable of being sufficiently managed. The flood risk at this site was not considered in the submitted Flood Risk Assessment (FRA). 3.1 This issue has been further discussed with the applicant. The applicant has confirmed that it is not yet known if the site will be required, or what the specific nature of the works on site will be, making it difficult to prepare an FRA.	No further comment.

ID	Written Representation	Applicants' Comments
	3.2 We have further considered the specific characteristics of the flood zones at this location. Given the large upstream floodplain, and the absence of built property at risk, it is our view that any potential increase in off-site flood risk is capable of being effectively managed. 3.3 A Flood Risk Activity Permit from the Environment Agency will be required prior to the commencement of any significant works within 8 metres of the Main River Ore at this location. A Flood Risk Assessment is required to accompany the permit application. We are satisfied that the flood risk implications can be considered and adequately addressed at that stage when the site specific details are known. 3.4 The draft Statement of Common Ground (June 2020; Document Reference: ExA.SoCG-3.D0.V1) between the Applicant and the Environment Agency confirms that: "The Applicants and Environment Agency agree that to resolve this matter the Applicants will undertake a Flood Risk Assessment of works required within Work No. 37 as part of any future Environmental Permit application." 3.5 We have confirmed in our response to question 1.7.1 of the Examining Authority's first written questions, that we remain otherwise satisfied with the applicant's approach to managing fluvial flood risk. A further 'Flood Management Plan' is to be prepared as part of the CoCP. Section 20.3.3 of the Environmental Statement (document reference 6.1.20) states that this will be developed in consultation with the Environment Agency and LLFA. The draft SoCG confirms that this will be noted in an updated Outline CoCP. 3.6 Additionally, the applicant has confirmed within the draft SoCG that the final CoCP will include a commitment to not store materials "within Flood Zone 2 or Flood Zone 3 along the length of the onshore cable route, and to store spoil outside of the Hundred River flood plain". This was a specific	

ID	Written Representation	Applicants' Comments
	request in our Relevant Representation to ensure no increase in flood risk elsewhere, and as a measure to protect water resources from pollution and increased sedimentation.	
05	**Water Resources and Water Quality** 4.1 As included in our Relevant Representation, we were generally satisfied with the assessment of impacts undertaken and the mitigation proposed. We requested further clarification on a number of issues. 4.2 Regarding the Hundred River crossing, we highlighted that construction works may affect flow and therefore could have the potential to impact on abstractors. We also highlighted that any abstraction or dewatering during construction could affect the Essex and Suffolk Water company compensation discharge into the river. 4.3 Through the draft SoCG the applicant has confirmed that measures to maintain sufficient flows will be included in the final CoCP, and noted for inclusion in an updated Outline CoCP. They have confirmed that there will be no transmission loss during over-pumping to facilitate cable installation, and it will be ensured that flow is sufficient to convey the compensation discharge. The applicant has also confirmed that consultation will be undertaken with abstraction licence holders. 4.4 A watercourse crossing method statement is to form part of the CoCP. The applicant has confirmed that we are to be consulted during the preparation of that document, and that this is to be referenced in an updated Outline CoCP. The applicant is additionally required to apply for the appropriate permits from the Environment Agency prior to undertaking the crossing works. This will include an Environmental Permit, and possibly an Impoundment Licence.	The updated SoCG submitted at Deadline 1 (REP1-077) includes the text referred to regarding the Watercourse Crossing Method Statement. The Applicants have no further comment on paragraphs 4.1 to 4.5. EA-309 within Regarding paragraph 4.6, the draft SoCG submitted at Deadline 1 has been updated to include a further commitment suggested by the Environment Agency during SoCG discussions, as follows: • A commitment that any dewatering activities that require an abstraction licence will follow the Environment Agency's Hydrogeological Impact Appraisal for Dewatering. No further comment on paragraph 4.7 to 4.10.

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	4.5 Comments on the Hundred River crossing in respect of further survey requirements are included in our ecology section, below. 4.6 In respect of groundwater, we previously highlighted that there appeared to be some uncertainty as to how the measures proposed to protect groundwater would be secured within the CoCP; with clarity also requested on when hydrogeological risk assessments (HRAs) would be required, including in relation to any groundwater dependent ecological sites. Through ongoing discussions with the applicant, the following has been proposed for inclusion in an updated Statement of Common Ground: The Applicants agree that the OCoCP will be updated to include: • A commitment to prepare a Method Statement for any crossings made by a trenchless technique within the onshore cable route (excluding landfall). This will provide details of the design parameters and any measures to minimise impacts upon groundwater; • Mapping of all existing abstraction licences, all domestic abstractions and all protected rights; measures will ensure no derogation to these as a result of the Projects; • A commitment to undertake a pre-construction water features survey (visual inspections) where required. This will be used to ensure that water features are identified and subject to hydrogeological risk assessments as necessary prior to works commencing. • Clear identification of whether dewatering activities will require an environmental permit. It will be specified that any water removed from subsurface excavations is returned to ground and that any water removed from a watercourse will be returned to the same	

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	watercourse, unless otherwise agreed with the Environment Agency. • A commitment to undertake a hydrogeological risk assessment for works that could cause changes to aquifer flow or affect aquifer quality within 500m of groundwater dependent ecological sites (i.e. international, European, national and county designations). A screening exercise will be undertaken (utilising desk-based information such as BGS borehole records, solid and superficial geological mapping and OS mapping, site citations, Natural England's Priority Habitats Inventory and Phase 1 habitat survey data where available) to determine whether or not identified ecological sites have features / habitats that are likely to be groundwater fed. Where features / habitats that are likely to be groundwater fed are within 500m of works that require excavations below 1m, a hydrogeological risk assessment will be undertaken. • A commitment to undertake a hydrogeological risk assessments for works that require excavations below 1m within 250m of boreholes or springs. We have confirmed to the applicant that the inclusion of the above text would be sufficient to satisfy our concerns on this, and other groundwater protection related issues. We have also suggested to the applicant that it may be useful for the Outline CoCP to highlight that any dewatering activities which require an abstraction licence should follow the Environment Agency Hydrogeological Impact Appraisal (HIA) for Dewatering. 4.7 The draft SoCG also confirms that the Outline CoCP will refer specifically to the groundwater protection method statement which will "consider impacts to groundwater quality and ensure methodologies to	

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	minimise construction-phase groundwater quality impacts are in place". As highlighted above, an updated Outline CoCP is to also state that the Environment Agency are to be consulted on the preparation of these documents. 4.8 In respect of foul drainage during construction and operation, we previously highlighted that the foul drainage hierarchy should be followed, with mains systems used wherever available. The draft SoCG confirms that the final CoCP will detail the hierarchy and justify the foul water drainage solution selected; and that this is to be noted in an updated Outline CoCP. 4.9 The applicant has additionally stated that the Environment Agency will be consulted on the surface water and drainage management plan, which also forms part of the CoCP. This is welcomed. A further key point raised in our Relevant Representation was the requirement to ensure that sufficient space within the development boundary is provided for the proposed sediment management control measures. In response to our representation the applicant has confirmed (AS-036, document reference ExA.RR3.D0.V1) that this will be the case, with design and size of the required features refined post-consent. We will assess this as part of our consideration of the draft surface water and drainage management plan. 4.10 The applicant has further confirmed in response to our Relevant Representation that the Outline CoCP will be amended to specify the Environment Agency as a consultee in respect of the pollution prevention and response plan.	
06	**Onshore Ecology** 5.1 As highlighted in our Relevant Representation, our main focus in relation to this topic involves the proposed crossing of the Thorpeness	No further comment.

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	Hundred River and other watercourses. Although broadly satisfied at the application stage, including in respect of the Water Framework Directive Assessment, we required some further surveys to be undertaken prior to any works, and further clarity in respect of how measures to minimize any adverse impacts were to be implemented. We can confirm that we are satisfied that appropriate controls are proposed to be in place. 5.2 The applicant has confirmed as part of the draft SoCG that pre-construction eel and fish baseline surveys will be undertaken, along with further water vole and otter surveys. We are to be consulted on the scope of those studies, with the requirement for that consultation to be specified in an updated outline landscape and ecological management strategy (OLEMS). The Ecological Management Plan (EMP) will include the results of the eel and fish baseline surveys, and the updated OLEMS is to further specify that the Environment Agency are to be consulted on the preparation of the EMP. 5.3 Through discussions with the applicant in respect of the draft SoCG, it has also been confirmed that the watercourse crossing method statement will include all measures to mitigate impacts on the Hundred River. It is to utilize all pre-construction survey results and will be based on a detailed assessment of the works to be undertaken. The applicant has stated that an Outline Watercourse Crossing Method Statement will be produced during the Examination. As mentioned above, an Environmental Permit from the Environment Agency will also be required prior to these works being undertaken. We would be looking for localized improvements to be incorporated wherever possible as part of channel restoration post installation.	

2.7 Historic England

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2. Comments In Relation To Environmental Statement: Onshore **2.1 The significance of St. Mary's Church, Friston**		
002	2.1.1. Historic England's principal concern is the impact of the onshore and national grid substations on the significance of the Church of St. Mary at Friston which is listed at grade II*. 2.1.2. Like many rural parish churches, St. Mary's is the result of several phases of building over the centuries. It contains fabric of the eleventh and twelfth centuries, although the main body of the church was built in the fourteenth and fifteenth centuries. It then underwent several further phases of work including restorations in the late nineteenth and twentieth centuries. This work illustrates changes in ecclesiastical architectural design and reflects patterns of worship over many centuries. 2.1.3. The church is set within a large and open churchyard. The grade II listed war memorial stands within the churchyard at the eastern end of the church and there is also a close association between this and the church. There are views out from the churchyard to the wider rural landscape and other parts of the village to the north and south east as described below. 2.1.4. The church lies on the northern edge of the village and has a largely rural and open landscape setting despite being within the village. The village of Friston comprises dispersed groups of housing. Closest to the church is an area of housing to the west and a few houses and farmstead to the east. The rest of the village lies to the south, separated from the church by the village green and fields between the churchyard and Grove Lane. To the north is a rural agricultural landscape.	The Applicants are in broad agreement with Historic England regarding the heritage significance of the church, the description of the setting and the contribution made by setting to the significance of this heritage asset. Comparison with the Applicants' analysis in ***Appendix 24.7*** (APP-519), paragraphs 91-94 illustrates the similarities on this point. The Applicants also query whether the final sentence of HE's point 2.1.12 should read "…do not disagree with their findings in this regard". The Applicants note HE's agreement in point 2.1.7 that the existing pylons and overhead power lines somewhat detract from the present-day rural landscape. The Applicants refer to their response to Q1.10.13 in Applicants' Responses to ***Examining Authority's Written Questions Volume 12 – 1.10 Landscape and Visual Impact*** (REP1-115) regarding the prominence, scale and impact on the existing landscape. The Applicants consider that they exert an important influence on the way that the landscape character is experienced, such as from the Public Rights of Way to the north of Friston, which pass directly under the overhead pylons and electrical lines, from which there are views of the church.

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	2.1.5. The church is the largest building in the village and sits on the rising ground to the north. The church tower (rebuilt in c.1900) is not particularly tall, but it rises above the other village buildings, which are mainly modest houses of one and a half to two storeys. The topography, scale of the building and the open landscape allow for the church to be experienced and enjoyed from the village and landscape beyond the churchyard. Particularly in views from the open countryside to the north and again to the south when approaching the village. 2.1.6. The open landscape to the north, which is currently publically accessible via a network of well-established and historic footpaths, allows for views from the north towards the church. The character of this landscape is essentially rural agricultural, comprising fields bounded by hedgerows and small areas of woodland. We understand from the work undertaken by Suffolk County Council that the footpath running through the application site is an ancient track way dating to the tenth century. This reflects historic boundaries and shows the longstanding pattern of use and connections between the church and village of Friston and farmsteads to the north (see Rapid Historic Landscape Assessment (2019) 5 & 7.2). 2.1.7 We are aware there is an existing power line which crosses this landscape. Whilst this does detract from its undisturbed rural character to some degree and the pairs of pylons are visible in the context of the church from some of the southern views described below. The cables are however seen at a height above the church and treeline and the cables and lattice framework of the pylons have a transparent nature that allows views through the structures. 2.1.8. To the south east there are fine views of the church from Grove Road across open fields crossed by a footpath. Also to the south there are	

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	views of the church tower across the village green over the housing. There are longer views from the south including those from the B1121. 2.1.9. The church is therefore prominent in the village and the surrounding area as the village's principal building, by virtue of the topography, its scale, architectural quality and the open landscape around the building. The landscape setting contributes to the significance of the church by enhancing its prominence within the village and surrounding area. It also adds to the appreciation of the building and the complements the spiritual values of the place. 2.1.10 The continuing phases of work to the church and the scale and prominence of the church also reflect the significant role of the church within the community over the centuries. Its listing at grade II* places it in a select group of important buildings that together with grade I structures, make up c.8% of all listed buildings. 2.1.11. The buildings and grounds are publically accessible and the oldest surviving building in the parish and it demonstrates high evidential, aesthetic, historic and communal values. 2.1.12. Historic England is aware that the village contains a number of other Grade II listed buildings and the Grade II* listed Friston Mill. Given our remit we have not provided comment upon the Grade II listed building within the village, and would refer the Examining Authority to the advice provided by the Local Planning Authority. The Impact upon the significance of the Grade II* mill has been covered in the applicant in the ES and we do disagree with their findings in this regard.	
2.2 Overall impact of the proposals on the significance of St. Mary's Church		

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003	2.2.1 The substations for EA1N and EA2 are identical with a maximum building height of 15 metres and external electrical equipment of up to 18 metres in height, covering an area of land up to 190 by 190 metres. There is also a requirement for a new National Grid (NG) substation to serve one or both of the substations. The proposed compound in the worst-case scenario (AIS substation) is 145 by 310 metres and a maximum building height of 6 metres and maximum outdoor equipment of 16 metres. 2.2.2. The proposed location would be in the rural landscape to the north of the church at Grove Wood. This is described as at least 400 metres from the church (Appendix 24.7 95). 2.2.3. The application contains visual representations of the development from a number of viewpoints in the surrounding landscape. These illustrate the nature and scale of the proposed development and the impact of this on the rural setting and significance of the Church of St. Mary. The visualisations provided with the applications very clearly show the scale and nature of the proposed developments, individually and cumulatively. 2.2.4. These substations, individually and cumulatively, would occupy a considerable area of land and the overall amount or quantum of development would be considerable They would therefore have a considerable and detrimental impact on the character of the land in the surrounding area and would be visible in longer views. 2.2.5. The scale of the substation development overall, it's contrasting character to the surrounding rural landscape, impact on these important views. The development would detract from the significance of the designated asset by eroding the historic landscape setting, and would impact upon the experience of the church in its immediate setting, from the land to the north and to the south, and from within the village. Development here, on this scale would also detract from its prominence in	The view of the Applicants is that it is important to make a clear distinction here between impacts on landscape character *per se* and change in landscape character that leads to impacts on heritage significance. Impact on landscape character is a relevant consideration of ***Chapter 29 Landscape and Visual Impact Assessment*** (LVIA) (APP-077). The Applicants recognise that there would be a significant adverse impact on landscape character within a localised area of approximately 1km around the proposed site for the onshore substations, particularly in the north of Friston, between Grove Road, Fristonmoor and Saxmundham Road. However, this becomes not significant on the wider landscape character of the Ancient Estate Claylands Landscape Character Type. Impact on heritage significance resulting from change in setting is a relevant consideration for Cultural Heritage Impact Assessment (***Chapter 24 Archaeology and Cultural Heritage*** (APP-072) and ***Appendix 24.7*** (APP-519 & APP-520))). The Applicants note that changes in landscape character that would affect the experience of the church in its setting could result in impacts on the significance of the church. The magnitude of that impact will reflect the degree to which the affected parts of the setting contribute positively to heritage significance and the level of change in the setting. Therefore when Historic England states, for example, that the development would "*profoundly change the character of the existing rural landscape*" (2.2.5) the Applicants would treat this as an assessment of impact on landscape character, comparable with its own finding of significant adverse impact on landscape character. It does not follow from Historic England's statement (quoted above) that there would be a profound change in the character of the setting of the church. The open

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	the landscape, which reflects its importance within the community and complements the spiritual values of the church. 2.2.6. In our view the nature of the development would profoundly change the character of the existing rural landscape. In place of an open agricultural field would be large compounds of electrical buildings and equipment. The alien character of this within the existing rural landscape together with the scale of the development described above would make the development very prominent within the landscape. 2.2.7. The existing power line which crosses the land to the north of the development site has been referred to above. The impact of the proposed development would far exceed that of the existing power line. While we accept the existing power lines do detract from the rural landscape, the transparency of the power line and its linear character is very different and in contrast to bulk and mass of the proposed substations.	agricultural field is also a reflection of the change in agricultural character which has occurred as a consequence of changes in agricultural practice in the later part of the 20th Century. ***Section 29.5.2*** of ***Chapter 29 Landscape and Visual Impact Assessment*** (APP-077) outlines the presence of large-scale modern agricultural buildings in the local landscape; a strong sense of agri-business land use (associated with straight and regularised field patterns to accommodate modern farming practices) The Applicants recognise that the scale and form of the substation development will contrast with the surrounding rural landscape, however they note that mitigation of effects on landscape character is provided in the Outline Landscape Mitigation Plan (APP-401-403) proposals as part of the submitted ***Outline Landscape and Ecological Management Strategy*** (OLEMS) (APP-584). The OLEMS proposes mitigation through the re-instatement of historic landscape features that have been lost over time, including historic field boundaries, tree lined avenues and woodland blocks. The Applicants note agreement that the power lines detract from the present-day rural landscape and considers that the double row of high-voltage overhead transmission lines and associated pylons form notable visual elements in the local setting of the landscape between the village of Friston and Fristonmoor, due to their large vertical scale and form. They are considered to exert an important influence on the way that the landscape character is experienced, such as from the Public Rights of Way to the north of Friston, which pass directly under the overhead pylons and electrical lines, from which there are views of the church.

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2.3. The impact of the EA1N and the National Grid (NG) substations on the significance of St. Mary's Church.		
004	2.3.1. The development of the EA1N and NG substation would be visible in views from the church yard and area immediately to the north of the church. This is shown clearly in the Cultural Heritage Viewpoint 8 (Appendix 24.7 2.2) taken from the War Memorial within the churchyard and again captured in the ES (Figure 29.14) from Church Road just to the north of the church. 2.3.2 The existing view from the churchyard is across fields with some trees and hedgerows to the rural landscape to the north. While the existing planting would be supplemented and offer a degree of filtering of views of the development it would remain clearly visible from here, particularly as it appears out of character with the wider rural landscape. 2.3.3. The view is more open from Church Road across the open landscape with some trees, hedges and woodland to the east. The power line which crosses this part of the countryside is also visible in the current landscape. The visualisation however again demonstrates the appearance of the substation in particular its scale and mass. The existing hedge line screens the lower part of the development but it starkly contrasts with the natural landscape. The proposed planting along the hedge line would strengthen this vegetation line to filter more of the development. However filtered views above the hedge line would exist and parts of the development would remain visible between and through the planting. 2.3.4. The development would affect the experience and views of the church from the land to the north. Here it would change the character of the landscape from rural agricultural land and erode the rural landscape setting of the church. The development would form a visually dominant group of structures in the landscape. There are clear views of the church across this landscape and the visibility and alien nature of the development	Historic England presents its assessment of the impact of the Projects on the significance of the church by reference to various photomontages that illustrate the points it wishes to make. The Applicants disagree with this assessment for various reasons, summarised here and following the order in which they appear in Historic England's written representation: 1. Historic England refers to two viewpoints close to the church (HE points 2.3.1 – 2.3.3). In the case of CH viewpoint 8 (War Memorial), The Applicant does not agree that the substation would be clearly visible from within the churchyard and consider that the photomontage shows how screening by vegetation (even in winter) ensures that the substation would not be readily apparent. The Applicants agree that it would be clearly visible from Church Road (as illustrated by Viewpoint 2) but do not consider that views looking north from here make a significant contribution to the significance of the church. 2. Historic England states that "*the development would affect the experience and views of the church from the land to the north*" and illustrates its assessment by reference to four viewpoints (HE points 2.3.4 - 2.3.9). The Applicants consider that none of the four viewpoints support the argument made by Historic England. Viewpoints 1, 4 and 8 are locations from where the proposed substations would be visible but they are not places from which the church can be experienced; therefore impacts on significance do not arise. In the case of Viewpoint 5 (close to Moor Farm), the church is visible in the distance, but it is an inconspicuous object seen against a background of trees. This is therefore not an example of the church as a prominent focal point in the landscape, the setting characteristic that both Historic England and the Applicants agree contributes positively to significance.

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	would compromise and obscure views of the building. This impact can be seen in the viewpoints 1, 4, 5 and 8. (ES Figures 29.13, 29.16, 29.17 & 29.18). 2.3.5. Viewpoint 1 is taken from the public right of way near Friston House (which is also listed at Grade II). This is just to the south west of the substation site and gives a clear indication of the nature of the proposed development. It shows the change in the character of the land were the development to be consented. The landscape is currently a rural, agricultural landscape comprising open fields, hedges and areas of woodland. It is traversed by existing power lines supported by pairs of pylons. These detract from the rural landscape to some degree; however the substation development would have a far greater impact. It would occupy a larger footprint on the ground with a denser arrangement of more solid structures including silos, towers and enclosed structures. This would radically alter the nature of the landscape from rural farmland to that of a large energy substation. This illustration demonstrates how the development would clearly erode the rural landscape within which the church is experienced. The visualisation with planting mitigation after 15 years shows the planting would screen much of development in this particular view. However, the impact on the experience of the church from this area would persist for the lifetime of the project. 2.3.6. Viewpoint 4 is taken from the junction of Grove Road and Church Road. Again it illustrates the scale and its alien character within the rural landscape which forms the setting to the church. The strengthening of the planting would help to filter some views, although we are concerned this would not be wholly effective. 2.3.7. Viewpoint 5 is taken from the north of the proposed development site from the public right of way near Moor Farm (again also Grade II listed). From here the church is seen across a rural landscape. Although	3. Historic England refers to CH Viewpoint 4 (Little Moor Farm) and state that "*In terms of the relationship between the land to the north of the church and the church, this is one of the most important vistas*" (2.3.8). The Applicants reached a similar conclusion in the Environmental Statement, noting that adverse impact on the church "*primarily resulted from the loss of views of the church tower when approaching Friston from the north along the footpath from Little Moor Farm.*" (Paragraph 164 of ***Appendix 24.7*** (APP-519 & APP-520)). However, it is important to note that, contrary to the position of Historic England, the Applicants consider that this is the only area where predicted change in the setting of the church would materially affect its significance. 4. The final viewpoint cited by Historic England in this part of its written representation serves to reinforce the point just made. In HE point 2.3.10, it states that "*the development would also greatly impact on key views of the church from the south*" but then only offers Viewpoint 6 as evidence, noting that "*there would be some erosion of the views from the village green*". The Applicants consider that the minimal predicted visibility of the substations from the green at Friston (as illustrated by the Viewpoint 6 photomontage) does not support the assertion that the development would greatly impact on key views of the church from the south.

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	this is currently traversed by the existing power line, the lattice structure of the pylons and the height of the cables allow views through the line which sits above the height of the tree line and church tower. The development would stretch across much of this view. It would not obscure views of the church which lies to the west. However, it would erode the rural setting and appreciation of the church from the north and introduce a much larger modern structure which would detract from the church as a focal point. In views to the east of the viewpoint, the development would clearly obscure the view of the church. Parts of the national grid substation would rise above the treeline of the wood. After 15 years the strengthening of the hedge line in the foreground would screen much of the development excepting some of the taller parts. However, again it would characterise the experience of the church from the north. 2.3.8. The Cultural Heritage Viewpoint 4 (Appendix 24.7) in particular shows the clear impact of the development on the view from the footpath from Moor Farm and how it would obscure views of the church. In terms of the relationship between the land to the north of the church and the church, this is one of the most important vistas. In particular the way in which the church is experienced in its landscape setting when moving south from Little Moor farm along the footpath towards the village. The prominence of the church and its dominance as a key landmark will be lost. 2.3.9. Viewpoint 8 is taken from the Saxmundham Road under the existing power lines across the fields to the north of Friston. Here the impact of the existing power lines is seen. The development would lie to the south of this where it would be seen against the wood and add a significant level of development to the rural landscape. The planting would add a modest additional screening to the existing hedge line.	

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	2.3.10. The development would also greatly impact on key views of the church from the south. There would be some erosion of the views from the village green. This is shown in viewpoint 6 (ES Figure 29.18) from the Saxmundham Road across the village green. The existing view illustrates how the church and its tower act as a landmark rising above the houses. From here some of the upper parts of the substations would be visible over the roofs of the houses in glimpsed views. The planting would not offer mitigation from here. Although existing two pylons are visible in the distance, the development would introduce a further alien element to the rural context of the church. It would erode the rural setting of the church and compromise the appreciation of the building.	
2.4. The impact of the EA2 and the NG substations, and the cumulative impact of EA1N, EA2 and the National Grid substation on St. Mary's Church		
005	2.4.1. From within the churchyard the EA2 substation would be more visible than EA1N and from Church Road EA1N would have greater prominence. The construction of both would clearly increase the impact. From Church Road and where both developments are shown, the plant is visible across much of the view between the two existing pairs of pylons. The proposed planting along the hedge line would strengthen this vegetation line to filter more of the development but these are filtered views above the hedge line and parts of the development would remain visible between and through the planting, consequently occupying much of the view. The development would clearly and dramatically change the character of the rural landscape. 2.4.2. In viewpoint 1 it is clear that the cumulative impact of both developments increases the amount of infrastructure that is visible although EA2 is partially screened by EA1N with the exception of a part to	In this section of the Written Representation, Historic England repeats the assessment already undertaken for East Anglia ONE North, now addressing the impact of East Anglia TWO. The majority of the analysis is based on the viewpoints already referred to in the assessment of East Anglia ONE North. The Applicants' commentary on these viewpoints (1, 2, 4, 5, 6, and CH Viewpoints 4 and 8) in the context of East Anglia ONE North applies equally to East Anglia TWO and is therefore not repeated here. However, it may be noted that the analysis of Viewpoint 8 by Historic England (HE point 2.4.7) is incorrect as it refers to a view of the church, but there is no such view from Viewpoint 8. A different viewpoint may have been intended. Historic England does make two additional points, not raised for East Anglia ONE North: 1. Historic England states that "*most significantly the long view of the nave and tower of the church from south of the village would be severely*

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	the south. The visualisation with planting mitigation after 15 years shows the planting would potentially screen development in this view. 2.4.3. The Cultural Heritage Viewpoint 4 (Appendix 24.7) in particular shows the clear impact of the EA2 on the view from the footpath from Moor Farm and how it would obscure views of the church. EA2 and the NG substation are clearly the most visible in terms of mass however the cumulative effect of both substations will completely obscure the view of the church. The mitigation does not seek to lessening the impact from this view and the footpath itself will be diverted which further harms the setting by changing the way in which the church is experienced when walking south towards the village. As set out above we consider this is one of the most important of the provided vistas to illustrate the relationship between the land to the north of the church and the church. In particular the way in which the church is experienced in its landscape setting when moving south from Little Moor farm along the footpath towards the village. The cumulative impact of the entire proposed infrastructure will mean the prominence of the church and its dominance as a key landmark will be entirely lost. 2.4.4. Viewpoint 4 is taken from the junction of Grove Road and Church Road. Again the addition of EA2 increases the density of development although this is in part screened by existing woodland in this view. The strengthening of the planting helps to filter some views. 2.4.5. In viewpoint 5 EA2 is located behind the national grid substation but its presence would create a denser development. After 15 years the strengthening of the hedge line in the foreground would screen much of the development excepting some of the taller parts. 2.4.6. Viewpoint 6 shows the view from the Saxmundham Road across the village green. EA2 would be more visible than EA1, sitting to the east of	*compromised by the backdrop of the substations*" (HE point 2.4.8). This is the view illustrated by Viewpoint 9. The Applicants do not agree with Historic England on this point and, in its own assessment (paragraphs 101 and 107 of ***Appendix 24.7*** (APP-519 & APP-520)) concluded that "*the status of the church tower as a landmark from the wider parish of Friston would not be compromised with the church tower remaining a prominent feature in these views.*" (paragraph 107). The church currently features as a prominent, but not dominant feature in this view, one of a number of buildings or similar scale with pylons rising in the background. The addition of the higher parts of substations to this ensemble, to the east of the church does not materially change the prominence of the church. 2. Historic England states that "*no visualisations have been produced of the fine views of the church from the south east from Grove Road but these are also likely to be considerable*" (HE point 2.4.9). The Applicants agree that there is a clear view of the church from the south-east at the point where Grove Road turns sharply to the north. This was not illustrated in the Environmental Statement, but the proposed substations would not be visible from here, given the rising ground and presence of buildings to the north in this view. The photomontage from a viewpoint on the footpath south of the church (CH Viewpoint 10) illustrates a very similar relationship a short distance to the west of the location highlighted by Historic England. There is therefore no evidence to support the conclusion by Historic England that there is likely to be considerable impact here. Overall, the Applicants consider the conclusion reached by Historic England (HE point 2.4.10), that there would be a very high level of harm to the significance of the church, is not supported by the evidence for visual change in the setting of the church and the effect this would have

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	this. The existing view illustrates how the church and its tower act as a landmark rising above the houses. From here some of the upper parts of the substations would be visible over the roofs of the houses in glimpsed views. The planting would not offer limited mitigation from here. Although existing two pylons are visible in the distance, the development would introduce a further alien element to the rural context of the church. It would erode the rural setting of the church and compromise the appreciation of the building. 2.4.7. Viewpoint 8 shows the view of the church from here would be significantly compromised by the substation development. The cumulative impact of both developments extends the plant much further to the east and is considerable. These would create a backdrop of additional, tall electrical plant that by virtue of its scale and alien nature within the landscape would seriously erode the rural landscape setting of the Church and how it is appreciated. In this key view, the planting would have almost no effect in screening the development, and we are concerned that the impact on these views could not be mitigated further. 2.4.8. Most significantly the long view of the nave and tower of the church from south of the village would be severely compromised by the backdrop of the substations. This is shown in Viewpoint 9 (ES Figure 29.21) from south of the village on the B1121 Aldburgh Road. This illustrates a long view towards the church across fields where both the nave and tower of the church are clearly visible. The existing power line is seen behind the church and is an existing and negative feature. However, this has a transparent nature so although the pylons are much taller than the church; the solid character of the building allows it to remain a focal point. The cumulative development of the substations would create a backdrop of additional, tall electrical plant that by virtue of its scale and alien nature within the landscape. In this fine view of the church, the building and it	on the positive contribution made by the setting to the significance of the church. The Applicants also refer to their response to Q1.8.3 in Applicants' Responses to Examining Authority's Written Questions Volume 10 - 1.8 Historic Environment (REP1-113) regarding 'substantial harm'. The policy of both NPS EN-1 and NPPF only recognises two degrees of harm, these are 'substantial' and 'less than substantial'. As stated by the ExA, all cases of harm identified in the ES are considered to be less than substantial (or a magnitude that is less than substantial).

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	significance would be compromised by the Substations. These would create a backdrop of additional, tall electrical plant that by virtue of its scale and alien nature within the landscape would erode the rural landscape setting of the building and how it is appreciated. In this key view, the planting appears to have no effect in screening the development. The impact of EA2 is the greatest from this location where the development is seen to the east of the church and the mass of the main structure erodes the prominence of the church. 2.4.9. In summary our concern is the development would impact on views from the church and its immediate vicinity to the north and in key views of the church from the north. Again from the south across the village green, and in the long views to the south of the village. No visualisations have been produced of the fine views of the church from the south east from Grove Road but these are also likely to be considerable. The presence of such a large development so alien in character to the existing rural landscape would comprise important views of the building and how the church is experienced. It would change the rural landscape that has formed the setting of the church for centuries. The scale and mass of the development would erode the prominence that the church has had within the village and its vicinity over several hundred years which reflects its importance to the community for the majority of that time. It would also erode the largely unspoilt nature of the landscape which complements the spiritual and communal values of the building. 2.4.10. We accept the effects within and from the landscape vary between EA1N and EA2 depending on the viewpoint and between the AIS and GIS substations however both individually and in relation to the cumulative impact Historic England considers this would result in significant effect a very high level of harm to the significance of the grade II* church. In EIA	

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	terms we would see that as equating to a medium to high level of harm resulting in a major adverse and significant effect.	
2.5 Additional comments in relation to Chapter 24: Archaeology and Cultural Heritage		
006	2.5.1 We note that the below ground archaeological remains have not as yet been fully evaluated through non-intrusive and intrusive evaluation approaches. Interpretations should therefore be regarded as preliminary until the outstanding survey work has been completed (see Chapter 24.1, paragraph 7). We considered for example there is a possibility of locating archaeological sites of equivalent significance to designated heritage assets (see 5.8.4 of the NPS for energy), and the lack of fully pre-determination evaluation provides risks in that regard. We also noted this in our PIER letter. In this landscape we would be particularly interested in prehistoric settlement and distribution of burial features as these, particularly upstanding barrows are the dominant surviving designated archaeological features in the landscape.	Noted. The Applicants have submitted the following documents to the Examinations at Deadline 1: • Pre-Construction Trial Trenching Report (REP1-024); • Geophysical Survey Report (REP1-025-33); and • Onshore Archaeology: Earthworks Report (REP1-034)
007	2.5.2 The embedded mitigation strategy that will be employed for the onshore archaeology has been presented in Section 24.3.3 and in Table 24.3. We are pleased to see that the main mitigation approach used will be avoidance, micrositing and route refinement. The detailed design of the onshore elements will be informed by evidence such as the archaeological assessment of the geophysical surveys (paragraph 36).	Noted.
008	2.5.3 It is stated in Section 24.5.3.1 that there is the potential for the non-designated heritage assets to suffer from both direct and indirect impacts as a result of the proposed development (paragraphs 118 & 119). It should be noted that the cable route has not yet been fully evaluated and therefore the full extent of any impacts cannot be determined in detail. It is stated that some remains, such as the earlier prehistoric remains are likely	The archaeological potential is described as medium in ***section 24.5.3.1*** of ***Chapter 24 Archaeology and Cultural Heritage*** (APP-072) as this was informed by the Desk Based Assessment (***Appendix 24.3*** (APP-514)). However, for the purpose of EIA the Applicants adopted a precautionary approach. This is demonstrated in ***Table 24.28*** of ***Chapter 24 Archaeology and Cultural Heritage*** whereby 'Impact 1 Direct

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	to only be discovered during intrusive archaeological investigation and could be of up to national importance (Section 24.5.3.2.1.1, paragraph 130). Despite this, the archaeological potential of the onshore development area has been classed as being 'medium' at this stage (Section 24.5.3.2.1.1, paragraph 129). We would therefore ask the applicant to consider whether this is appropriate.	Physical Impact on Buried Archaeological Remains' is assigned up to high heritage importance and magnitude as a worst-case scenario. The residual significance rating of minor adverse accounts for sufficient space within the order limits for micrositing and other mitigation measures set out in the ***Outline WSI (Onshore)*** (APP-583).
009	2.5.4 We are pleased to see that additional mitigation measures will be employed to investigate and assess deposits of palaeoenvironmental/geoarchaeological potential, which will likely include a programme of geoarchaeological monitoring of engineering-led GI works. This will also identify the additional work that is required (Section 24.6.1.4.2, paragraph 224).	Noted.
010	2.5.5 Section 24.6.1.5 discusses the potential impact that the bentonite drilling fluid used in HDD may have on buried archaeology. We are pleased to see that a strategy has been developed to mitigate the risks of bentonite slurry outbreak to ensure that fluid pressures are monitored and an action plan developed so that any breakout will be handled quickly and efficiently (Section 24.6.1.5.1, paragraph 230). Historic England would like to see the action plan to ensure that the buried archaeology will be managed appropriately in relation to the potential impact upon the historic environment.	Noted. As stated in ***section 24.6.1.5 of Chapter 24 Archaeology and Cultural Heritage*** (APP-072), further details are provided in the ***Outline Code of Construction Practice*** (APP-578) and ***Outline WSI (Onshore)*** (APP-583). Final information regarding the management of bentonite will be provided in the final CoCP and WSI post-consent following detailed design and appointment of contractors. The final WSI will be prepared post-consent in consultation with SCCAS and HE.
2.6 Comments on Document 8.5: Outline WSI Archaeology and Cultural Heritage (onshore)		
011	2.6.1 It is acknowledged that this is an outline WSI, and that final survey-specific preconstruction and construction related mitigation WSIs will be produced post consent (Sections 1.1, 1.3 and 7). The outline WSIs will set out the general principles, strategies and methods that will be implemented post-consent, and will include set-piece excavations, Strip, Map and	Noted.

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	Sample investigations, and archaeological monitoring/watching briefs (Section 1.1, paragraphs 12 & 13).	
012	2.6.2 The aims and objectives of the proposed Trial Trench excavations would appear to be adequate and relevant (Section 6.2 & Appendix 3). It is good to see that Geoarchaeological and Palaeoenvironmental survey work has also been included in the proposed works and that guidance will be followed and referenced where relevant.	
013	2.6.3 We support an approach which seeks opportunities to preserve sites in situ. We also recommend that the Historic England document 'Preserving Archaeological Remains' (2015) is referenced.	
Comment on Appendix 3: WSI for a programme of Targeted Archaeological Trial Trenching		
014	2.7.1 An outline of the environmental sampling strategy has been provided in Section 7.5, stating that a number of different types of samples will be considered where appropriate, including the collection of monolith and specialist samples to assess plant remains, pollen, waterlogged wood etc. which is good to see. It is also stated that 40-60L samples will be collected from deposits such as occupation and midden deposits, and ditch and pit fills. It is however, important at the evaluation stage to collect samples from all types of deposits that are relevant to the aims of the sampling strategy, as many classes of environmental material are not visible to the naked eye, such as chaff fragments and small weed seeds (HE 2011, p9). The samples should also be processed in a timely manner to ensure that the archaeological remains are stable. We recommend this section is amended to cover this point.	This will be considered by the Applicants in the wider scheme for trial trenching.

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015	2.7.2 Section 7.11 states that all artefacts will be washed, but it should be noted that some remains, such as pottery vessels where organic residues are preserved, should be excluded from this. Washing may remove delicate archaeological evidence, which may provide information about what was stored in a vessel. We recommend this section is amended to include this point	
016	2.7.3 Section 9.1 discusses the post-excavation work. It is not clear if any of the samples will be processed to inform the interim report, as it is stated that the full analysis of all finds and environmental samples will take place at the earliest time after the interim report has been completed. The evaluation of environmental samples will contribute to the understanding of the potential and significance of the archaeological resource, as stated in the Historic England document, 'Environmental Archaeology' (2011). We would therefore recommend that samples assessed as part of the evaluation stage of works and the WSI is amended accordingly.	The Applicants refer to the Pre-construction trial trenching report (REP1-024) submitted at Deadline 1. This will be considered by the Applicants for the wider trial trenching scheme and in future reporting.
3. LEGISLATIVE AND POLICY CONTEXT **3.1 Planning Act 1990**		
017	3.1.1 In determining this application the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess should be borne in mind.	In respect of applications under the 2008 Act the test is to "have regard to" not special regard. Please see Regulation 3 The Infrastructure Planning (Decisions) Regulations 2010
3.2 EN-1 Overarching NPS for Energy		
018	3.2.1 The Overarching National Policy Statement for Energy EN-1 sets out the National Policy Statement for Energy infrastructure (see 5.8). It	Noted.

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	recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment.	
019	3.2.2 Of relevance to the trenched evaluation here is 5.8.4 which notes that heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance may include, those that have yet to be formally assessed for designation, those that have been assessed as being designatable but which the Secretary of State has decided not to designate; and, those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979.	
020	3.2.3 Section 5.8.12 considers that in considering the impact of a proposed development on any heritage assets, the Examining Authority would need to take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. It continues that account should be taken of the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution they can make to sustainable communities and economic vitality. The Examining Authority would also need to take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment (5.8.13).	
021	3.2.2 There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. This is because, once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact.	

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	Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification (5.8.14).	
022	3.2.3 Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss (5.8.15).	
023	3.2.4 In relation to development affecting the setting of a designated heritage asset, it states that applications should be treated favourably that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, any negative effects should be weighed against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval (5.8.18).	
024	3.2.5 The policy that is set out above echoes that which is set out in the National Planning Policy Framework. This also includes a definition of the setting of a heritage asset, 'the surroundings in which a heritage asset is experienced.	The Applicants would highlight that paragraph 5 of the NPPF states "*The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework*". The Applicants therefore note the emphasis in the NPPF on meeting the specific tests of the NPS. In particular the policy of "great weight" set out in paragraph 193 of the NPPF is not reflected in paragraph 5.8.15 of NPS EN-1. Section 104 of

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		the Planning Act 2008 gives statutory weight to the NPS policy and where there are differences the NPS specific policy should be applied. Notwithstanding the requirement to give primacy to NPS policies, there are aspects of the NPPF which are likely to be relevant and material. Subsequent questions discuss aspects of impact on Listed buildings. It is important to note that the Statutory test for considering such impacts is also slightly different from that applying in the standard Planning context. The test of having "special regard" as set out in section 66 of the Planning (Listed Buildings and Conservation areas) Act 1990 is reduced to having "regard" through regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010. The different legal and policy tests are important to the decision-making context.
025	3.2.6 Setting of heritage assets is considered further in the Planning Practice Guide. This sets out how the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. It also notes that although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. It continues that the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.	Noted.

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The Historic Environment Good Practice Advice in Planning, GPA 3		
026	3.3.1 This provides further advice on setting. This provides general advice on understanding setting and how it may contribute to the significance of heritage assets. In particular its notes that setting is often expressed as views and that those which contribute to significance can include where relationships with other heritage assets are particularly relevant (page 10). The document makes specific reference to church towers '*Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view*.'	Noted.
027	3.3.2 The document also provides a staged approach to taking decisions: identifying heritage assets affected; assessing how setting contributes to significance; assessing the effect of the proposals on significance; exploring how to maximise enhancement and avoid or minimise harm and making and documenting the decision.	
4.0 Historic England Position: Onshore Historic Environment **4.1 St Mary's Church, Friston**		
028	4.1.1 We have set out in the statement above how the setting of the Church of St. Mary contributes to its significance and the impact that we consider the proposals will have on this significance, both individually and	The Applicants have addressed the comments made by Historic England in support of its conclusions in rows 004 and 005 of this table.

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	as a combined scheme. Having considered all the evidence our conclusion is that this development would result in a very high level of harm to the significance of the grade II* church. In ES terms we would see that as equating to a medium to high level of harm resulting in a major adverse, and significant, effect.	
029	4.1.2 There is some clear difference between the schemes in certain views, and this is set out above however the impact of the developments both individually and cumulatively remains high, and the effect we consider would still be in the major adverse category.	
030	4.1.3 The Environmental Statement considers the impact at construction, operation and decommissioning. The indirect impact of construction and decommissioning are considered to be of short duration or temporary and therefore not subject to detailed assessment (ES 158). The effects result from the presence of construction equipment and vehicles and environmental impacts such as dust and sound (ES 216). These are considered to be temporary or short in duration and therefore not resulting in material harm or being assessed further (ES 217). Historic England agree therefore that the impact of the operation phase is the most important to consider given this would be a long standing residual impact. However, the adverse impact of the construction phase, which is likely to be of some time, and the harm that additional construction equipment and vehicles and environmental impacts of this would have on the rural landscape setting of the Church of St. Mary should not be dismissed.	Historic England states that "*the harm that additional construction equipment and vehicles and environmental impacts of this would have on the rural landscape setting of the Church of St. Mary should not be dismissed*". However, it does not offer any assessment of what the magnitude and significance of these impacts might be. As noted by Historic England, it was concluded in the Environmental Statement that the duration of construction phase impacts was temporary and of too short duration to lead to material harm through change in setting (paragraph 230 of ***Appendix 24.3*** (APP-514) and paragraph 12 of ***Appendix 24.7*** (APP-519 & APP-520))). This approach to assessment was discussed and agreed with Historic England as part of the Expert Topic Group at Section 42.
031	4.1.4 The Environmental Statement assesses the heritage importance of St. Mary's Church as high, the magnitude of impact as low and the significance of effect as moderate adverse (ES Table 24.21). A low magnitude of impact is defined as 'Elements of the asset's fabric and/or setting which contribute to its heritage significance are affected, resulting in	The Applicants note that it is for Historic England to reach its own conclusions regarding the magnitude of impact on significance based on its assessment of the evidence and professional judgement. However, even on its own terms, Historic England's case cannot support a finding of high adverse magnitude. High adverse magnitude applies in cases

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	a slight loss of heritage significance.' (ES Table 24.8). Using the significance of effect matrix table (ES Table 24.9) this equates to moderate adverse effect.	where the significance of an asset is either lost or at least severely compromised. This is clearly not applicable to the Church of St Mary at Friston where the building itself (where the majority of significance resides) remains untouched and only one part of the setting would be altered. The Applicants consider that a finding of medium adverse magnitude is also inappropriate given the fact that the only substantive reduction in significance relates to loss of sequential views towards the church along one section of footpath from Little Moor Farm. This leaves the majority of the positive contribution made by setting to the significance of the church intact (as described in paragraphs 104-109 of ***Appendix 24.7*** (APP-519 & APP-520)).
032	4.1.5 Historic England's assessment of the magnitude of impact differs. We consider that it should be set at medium, which is considered to be 'Elements of the asset's fabric and/or setting which contribute to its significance are affected, but to a more limited extent, resulting in an appreciable but partial loss of the asset's heritage significance.' Or even high, which is stated as 'Key elements of the asset's fabric and/or setting are lost or fundamentally altered, such that the asset's heritage significance is lost or severely compromised.'	
033	4.1.6 Either magnitude of impact would result in the effect being assessed as 'major adverse.' This is defined as (see Tables 24.10) 'Change in heritage significance, both adverse and beneficial, which are likely to be important considerations at a national or regional level because they contribute to achieving national or regional objectives. Effective/acceptable mitigation options may still be possible'. (Tables 24.10)	
034	4.1.7 The detailed assessment which has informed the assessment in the Environmental Statement is found in Appendices 24.3 and 24.7. This considers that visual change is the only aspect that could be changed in a way that would materially affect heritage significance (24.3, 13). Noise levels were also considered but a commitment from the application that the design would not exceed agreed noise limits at the nearest noise sensitive receptors led to the conclusion the change in noise levels would not be sufficient to materially affect heritage significance (24, 3.14).	
035	4.1.8 The detailed assessment of the impact of the development on heritage assets is contained in Appendix 24.7. This considers the impact	

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	on the setting of the church from the immediate area, short range views and longer views and concludes that in relation to each 'the contribution made by setting to the significance of the church in these views would not be materially affected with the exception of the view from the footpath to the north from Little Moor Farm (105 - 108). This leads them to conclude an effect of moderate significance (109). Historic England's assessment of impact is set out above and differs from the Applicant's for the reasons expressed.	
036	4.1.9 The Environmental Statement also considers the cumulative assessment of the impact of EA1N and EA2. This considers two construction scenarios, the first the substations are built simultaneously or the second, consecutively. The second scenario is considered the worst case scenario on archaeology and cultural heritage (ES 253). The effects result from the presence of construction equipment and vehicles and environmental impacts such as dust and sound (ES 263). This is summarised in Table 24.22 in relation to although in general terms not in relation to individual assets under Indirect Impacts, Changes in Setting. This assesses no impact or change due to being a temporary or short term effect (ES 265).	
037	4.1.10 Historic England agree the impact of the operation phase is the most important to consider given this would have the most long standing impact. However, the adverse impact of the construction phase, which is likely to be of some time, and the harm that additional construction equipment and vehicles and environmental impacts of this would have on the rural landscape setting of the Church of St. Mary should not be dismissed. In terms of the cumulative impact of operation which does consider individual heritage assets, this assesses a high heritage importance, low magnitude of impact and a moderate adverse effect (ES	

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	Table 24.22). Historic England considers the magnitude of impact to be medium to high. This would result in a major adverse effect.	
038	4.1.11 The legislative context sets out the desirability of preserving listed buildings and their setting. This is reinforced in EN-1 and the NPPF and accompanying Planning Practice Guide. These restate the value of heritage assets for this and future generations. The presumption in favour of their conservation and the greater their significance, the greater this presumption should be. The Church of St. Mary is a grade II* listed building, putting it in the top 8% of all listed buildings. The presumption in favour of its conservation should therefore be high. The policy continues that any loss of impact requires a clear and convincing justification and a harmful impact should be weighed against the public benefit of the proposal.	The Applicants refer to their response to Q1.8.1 in ***Applicants' Responses to Examining Authority's Written Questions Volume 10 - 1.8 Historic Environment*** (REP1-113) regarding the historic environment policy balance.
039	4.1.12 The proposal would clearly deliver public benefits and it is for others to assess and weigh these benefits. However, in view of the high level of harm the proposal would cause to the highly graded Church of St. Mary, we object to the substation aspect of the proposal and ask that great weight is given to the conservation of the church in the decision making process.	
040	4.1.13 In terms of mitigation, the ES for both schemes provides embedded mitigation for the Historic Environment in relation to St Mary's Church and this is in the form of screen planting, woodland creation and restoration of hedgerows. This is set out in the OLMP (see ES 8.7), and through engagement the historic environment has been considered with in these proposals (see 8.7, 60). We note however that the LPA ecologists and landscape teams have raised concerns about the degree to which the planting would be successful, in particular the growth rates in relation to environmental considerations location and so on, and that what is	The Applicants note Historic England's recognition that the historic environment has been considered in the Outline Landscape Mitigation Plan proposals (APP-401 to APP-403). The Applicants note a trade off between potential landscape and visual impacts and potential cultural heritage impacts at the substation site through the mitigation planting associated with the implementation of a landscape management scheme. The Applicants consider that the planting proposals contained within the ***OLEMS*** (APP-584) and Outline

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	expressed in the application may be considered to be a 'best' rather than a 'worst' case scenario. We fully acknowledge that this is not an area of expertise for Historic England and that we do not have the same degree of local or topic knowledge on which to draw. We are however concerned that if the embedded mitigation does not perform to the degree that is stated in the applications then this will reduce the efficacy of the mitigation and reduce the degree to which the harm to the historic environment is reduced. This would therefore be something to be considered when weighing the balance.	Landscape Mitigation Plan (Figure 29.11a (APP-401)) have had regard to the potential impacts upon both landscape and visual and cultural heritage receptors, and represents an appropriate balanced approach to mitigation impacts for each of these receptors. This matter remains under discussion with the Councils within the SoCG process (REP1-072). The Applicants note ongoing discussions with the Councils in the SoCG process regarding early planting and an adaptive maintenance and aftercare period to provide plants with the best chance of establishing. The Applicants will provide an updated ***OLEMS*** (APP-584) at Deadline 3. As outlined in the Project Update Note submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants have committed to a reduction in the maximum footprint of each onshore substation to 190m x 170m. This represents an approximate 10% reduction in the development footprint of each onshore substation. Further information will be provided at Deadline 3.
5. COMMENTS IN RELATION TO THE ENVIRONMENTAL STATEMENT: OFFSHORE **5.1 Offshore and Intertidal Archaeology and Cultural Heritage – Document Reference: 6.1.16.**		
041	5.1.1 As set out above the comments below are applicable to both the EA1N and EA2 applications. Only where comments differ have specific document references been clearly detailed.	Noted.
042	5.1.2 The EIA (Chapter 16) identifies, describes and assesses in an adequate manner, the potential direct and indirect effects of the EA1N and EA2 on the marine historic environment and we are broadly content with the approach.	Noted.
043	5.1.3. To ensure that the environmental impact assessment and the resulting decision involve full consideration of archaeological sites and	The ***Outline Offshore WSI*** (APP-583) will be amended at Deadline 3 to include reference to the Valetta Convention. Specifically, provision is

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	their settings, we request that the European Convention on the Protection of the Archaeological Heritage (revised) (Valletta 1992) is referenced appropriately. This is also of relevance to the outline Offshore Written Scheme of Investigation (Offshore WSI see 8.6) where provision need to be made, where feasible, for the in situ conservation of heritage assets found during development work. We have made further specific comments on Offshore WSI below.	made in the WSI in ***section 1.6.1*** for the in-situ conservation of heritage assets found during development work through commitment to the implementation of Archaeological Exclusion Zones (AEZs).
044	5.1.4 The ES states the assessment of impacts has been undertaken in accordance with the 2017 EIA Regulations. Chapter 5 'Environmental Impact Assessment Methodology' outlines an acceptable approach whereby the EIA should be based on clearly defined environmental parameters. These would define the range of development possibilities and hence the likely environmental impacts that could result from the project. With Section 16.3.2 'Worst Case' further stating that the full design parameters of the proposed project have yet to be fully determined, and may not be known until sometime after the consent, should it be granted.	Noted.
045	5.1.5 Table 16.1 'Realistic Worst Case Scenarios' presents the summarised maximum possible effect upon the offshore archaeological and cultural heritage resource within the study area. We feel to ensure clarity, Table 16.1 should elaborate on whether the "20m maximum width along cables" related to "Pre-grapnel run / sweeping (boulder clearance)" will be applied to the full extent of individual cables - both Export and Array. Furthermore, it is unclear whether this has been considered more generally within Chapter 6 'Project Description'. There appears to be no specific detail related to pre-lay grapnel clearance work or whether it has been included within Table 6.19 'Total Area, Volume and Maximum Daily Sediment Volume Interaction Calculations during Cable Installation' for instance. Further clarification is needed in that regard.	For clarity, as a worst case it is assumed that pre-grapnel run / sweeping (boulder clearance) will be required along the full extent of the cable routes. Worst case disturbance areas are provided in ***Table 9.2*** in ***Chapter 9 Benthic Ecology*** (APP-057) and are as follows: • 160km export cable = 3,200,000m^2 • 200km of inter-array cable = 4,000,000m^2 • 75km of platform link cable = 1,500,000m^2

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046	5.1.6 We are also seeking clarity as to whether the worst case scenario relating to the "maximum area of sea bed disturbance" of offshore export cables is associated with the route options of 'Northern' or 'Southern' export cables for both EA1N and EA2? Furthermore, subject to consent for both developments, there is also uncertainty as to how these pre-commencement works will be undertaken. We recommend that a phased approach should be implemented, whereby the complete pre-construction and even partial construction of a single projects export cable is undertaken ahead of another, it becomes a seabed constraint in its own right, therefore limiting the flexibility for the placement of the other OWF project along a shared export cable route. As a result this presents an important consideration that needs to be captured in Chapter 16. In particular how embedded mitigation measures can be delivered (to avoid and reduce any prospect of significant impacts to features of the historic environment), with a similar implication upon factoring in the export cable route of the consented EA Three OWF amongst the two proposed array areas.	The Applicants acknowledge this could have been made clearer in ***Chapter 16 Marine Archaeology and Cultural Heritage*** (APP-064). For East Anglia TWO the worst-case maximum area of sea bed disturbance in relation to the export cables is explained in ***section 9.3.2.4.3*** of ***Chapter 9 Benthic Ecology*** (APP-057). The worst case was calculated based on the northern route (see ***Figure 9.2*** (APP-116)) which has the largest area of the two routes. East Anglia ONE North has only one cable route. The avoidance of heritage assets and mitigation measures to be implemented would be managed through the WSI as secured by condition 17(1)(g) of the Generation DML and 13(1)(g) of the Transmission DML. This would also be the case for the East Anglia THREE project which will have its own WSI protocols. The Applicants will engage with Historic England through the SoCG process on their recommendation for implementation of a 'phased approach' to understanding the historic environment.
047	5.1.7 We consider the geophysical survey data coverage, quality and techniques, and the assessed and interpreted information presented, is sufficient to characterise the known and potential features of the marine historic environment within the EA1N and EA2 OFW study area. Tables 16.5 and 16.6 summarise the geophysical data assessed within the wind farm area and export cable route respectively, including the quality of the data and the line spacing used.	Noted.
048	5.1.8 We have stated in our response to the PEIR (HE letter dated 26th March 2019) that the sub-bottom profiling line spacing used were generally much larger than those recommended in our guidance (see Historic England Marine Geophysics 2013). The data included in Tables 16.5 and	The ***Outline Offshore WSI*** (APP-583) includes a commitment to the production of method statements for individual survey/work packages to be agreed post-consent in consultation with Historic England (para 12). The WSI also acknowledges that full sub-bottom profiler coverage was

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	16.6 are the same as presented in the PEIR document. We consider that to adequately address Historic England's requests at the PEIR stage additional sub-surface stratigraphic profiling techniques would need to be considered in the survey strategy at post-consent. It would be important to have further discussions with the applicant and their appointed archaeological contractor, in relation to the above guidance, and to ensure that we receive method statements for all surveys undertaken during post-consent.	not achieved across all areas (para. 55). To this end, the WSI recommends that a data review is undertaken post-consent to qualify the continued suitability of the existing data and assessment to the project, identify data gaps and inform the acquisition of further geophysical data before the start of the pre-construction phase (para. 57). These are secured through Conditions 17(1)(g) and (4) in the generation DML and Condition 13(1)(g) and (4) in the transmission DML (these references to the conditions that secure the Outline Offshore WSI apply throughout this document and are not repeated again).
049	5.1.9 Section 16.5.2 adequately summarises the known maritime and aviation archaeology recorded within the wind farm and cable corridor development area. It is also notes that large quantities of the geophysical seabed anomalies are currently classed as 'A2', and are of uncertain origin. Possibly they are archaeological interest, even at this stage, and many of these relate to magnetic only anomalies (Tables 16.13 & 16.16, paragraph 95). It was also noted that it cannot be guaranteed all ferrous items have been identified due to the line spacing used for the magnetometer survey (1000m). We consider that if implemented correctly the embedded and additional mitigation measures set out here (listed in Table 16.2) should ensure appropriate levels of protection or further investigation for archaeological receptors. More specific comments on these measures are detailed below.	Noted.
050	5.1.10 Chapter 16 consistently refers to the applications proposed embedded and additional means of mitigating impacts within 'Section 16.1.1'. However there appears to be no Section 16.1.1 included within this chapter. Therefore we request that this is amended and clarified appropriately.	This was a typographic error, the correct reference is ***section 16.3.3*** and ***Table 16.2***.

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051	5.1.11 We are pleased to see that the embedded mitigation includes the avoidance of known heritage assets through the establishment of Archaeological Exclusion Zones (AEZs) or through additional mitigation such as micro-siting. We note that it is unlikely that AEZs will be established for A2 anomalies of possible archaeological origin (Table 16.2). In these cases, the mitigation proposed is that anomalies will be avoided through micro-siting where possible. However, anomalies that cannot be avoided will be investigated further to establish their character, nature and extent. These will need to be subject to discussion with Historic England, so that an appropriate mitigation strategy can be developed on a case-by-case basis.	Noted. The ***Outline Offshore WSI*** (APP-583) addresses Archaeological Investigation using Divers and / or ROVs in ***section 1.5.3*** which also includes the commitment that a detailed method statement for any archaeological works will be agreed in advance of works commencing with Historic England (para. 80).
052	5.1.12 In general, this approach would be satisfactory; however we consider the Applicant would need to define a carefully considered spatial threshold by which anomalies - that cannot be avoided – would be investigated by Diver or ROV. As has been seen on other renewable energy projects this is in part due to the fact that the current high level of seabed anomalies is likely to increase significantly prior to construction, in both the spatial distribution and potential for burial of seabed anomalies, as a result of high resolution and prescriptive geophysical surveys. It is also therefore important for the applicant to understand that a cluster of A2 geophysical anomalies may represent an associated assemblage of archaeological remains, which is not altogether immediately apparent from the geophysical survey alone. Similarly of note, wrecked vessels and aircraft remains can be dispersed over a very wide area. Therefore we welcome the opportunity to discuss the investigative strategy in more detail at a later date subject to consent; this is especially the case in view of recent work carried out within the southern North Sea region, specifically the EA1 OWF project	Noted. As stated above, the ***Outline Offshore WSI*** (APP-583) addresses Archaeological Investigation using Divers and / or ROVs in ***section 1.5.3*** which also includes the commitment that a detailed method statement for any archaeological works will be agreed in advance of works commencing with Historic England (para. 80).

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053	5.1.13 Within the context of the of the turbine array locations, it is stated that secondary impacts, through increased erosion, may be experienced in the area surrounding each turbine, but will be mitigated either through the implementation of appropriate AEZs for A1 anomalies, and micrositing for A2 and A3 anomalies (paragraphs 179-180 and Table 16.2). We are seeking further clarification from the applicant on this matter as there is more than one occasion in the environmental statement (ES) where the A3 recorded sites are listed as having a 100m AEZ around the centre point of the recorded location, specifically Table 16.24 (EA1N) and 16.22 (EA2). Given the locations and nature of the listed A3's, we feel AEZ's should be considered appropriate in this particular instance.	There is a single A3 record, located just outside and to the north of the offshore cable corridor at the nearshore end which has been assigned a 100m AEZ. Feature 700563 corresponds to a charted unknown wreck site (UKHO 87912), the recorded location of which is beyond the coverage of the geophysical datasets. There are no A3 anomalies within the EA1N array area. There is a single A3 anomaly within the EA2 array area (70700), which is covered by the geophysical data and which has not been identified by Wessex Archaeology. The outline Offshore WSIs provide additional clarity on a distinction between: a) those A3 anomalies (specifically 700563) assigned a 100m AEZ which have not been seen in the geophysical data but at which archaeological material is likely to be present (possibly buried); and b) those A3 anomalies (specifically 70700) which have not been seen in the geophysical data and at which the presence of surviving material is considered unlikely which will be avoided by micrositing. The Applicants acknowledge that this distinction has become unclear in the ES due to a typo in ***Table 16.2***.
054	5.1.14 We would like to raise the point that when establishing AEZs for maritime and aviation heritage assets, their specific tolerances to change (within the environment they are situated) can vary. It is not always possible to measure or account for such factors without appropriate survey and investigative data – whilst also balancing adequate seabed space for the development. Consequently understanding the significance of individual heritage assets and the potential development impact depends	Noted. The nature and extent of AEZs (and subsequent monitoring requirements) will be established/updated in consultation with Historic England following the acquisition of pre-construction geophysical data as set out in the ***Outline Offshore WSI*** (APP-583).

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	on how detailed the provision to attain targeted information can be from the outset; and in incorporating archaeological advice. The individual AEZs that are then implemented are done so to work as effectively and proportionately as possible during construction, operation and decommissioning. With the provision of post-construction monitoring that follows, utilising acquired high resolution acoustic images in which to determine change against the previously recorded baseline conditions.	
055	5.1.15 It is also worth noting that some AEZs currently being implemented may also be subject to change, in view of more comprehensive geophysical surveys being undertaken (subject to consent). These surveys might indicate outlying anomalies close to wreck sites that will need to be preserved in relation to their associated centrally located assemblage. Therefore, whilst such mitigation is embedded, it is not to be viewed without the possibility of modification.	Noted. As above, the nature and extent of AEZs (and subsequent monitoring requirements) will be established/updated in consultation with Historic England following the acquisition of pre-construction geophysical data as set out in the ***Outline Offshore WSI*** (APP-583).
056	5.1.17 Section 16.5.6 discusses the 'anticipated trends in baseline conditions' within the proposed development area. It is noted that the landfall location is within a dynamic stretch of coastline, with coastal erosion and shoreline retreat, including the collapsing cliffs (EA1N paragraph 134 and EA2 paragraph 135). This may have a positive or negative impact on any heritage assets in the area, either by eroding them or by covering them in material. More generally the direct and indirect changes that the development may have on heritage assets are discussed in Section 16.6 'Potential Impacts' in terms of how assets may be degraded/damaged or protected, and Section 16.6.2.3 in terms of the negative impact that scour protection installed on the turbines may have on nearby buried archaeology (paragraph 176).	Noted.
057	5.1.18 The potential impact of a breakout of drilling fluid used in the HDD process has been discussed in Chapter 16.6.1.5 in terms of how this could	Noted.

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	impact buried archaeology (paragraphs 169). We are pleased to see that this has been considered for this project, and that a strategy that will be employed to minimise the potential for breakout has been devised. Any mitigation required to manage fluid breakout would also need to take into consideration historic environment impacts.	
058	5.1.19 We are also pleased to see that the potential for previously undiscovered prehistoric site and deposits of palaeoenvironmental interest are being considered (Section 16.5.1, paragraph 72 in EA1N & 73 in EA2), and the information provided in Table 16.12 regarding the archaeological potential of each of the identified units is very useful. The discussion of the potential complexity of these deposits and the presence of organic layers, as indicated by the existing geophysical survey and geoarchaeological evidence was good to see as this demonstrated the information that this project can add to our understanding of sea-level change and the changes to environments and landscapes over time. We also welcome the included reference to recent geoarchaeological evidence from consented developments such as EA1.	Noted.
060	5.1.20 We agree that the direct impacts the proposed development may have upon potential heritage assets are generally considered to be of potentially major adverse significance (Section 16.6.1.2, paragraph 156).	Noted.
061	5.1.21 Table 16.22 summarises the assessments of heritage significance (importance); we are pleased to see that palaeoenvironmental material has been included in the assessment, and is classified as being of high significance if the material was associated with specific palaeolandscape features.	Noted.
062	5.1.22 The assessment of cumulative impacts is consistent with the agreed methodologies. We do however consider that there exists the potential for	Noted.

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	a variety features and remains to be found within the development area. These could represent not only individual heritage assets, but also those rarer sites that may be connected to significant past events, and thereby form a broader group value whilst contributing to the story of a landscape or seascape.	
063	5.1.23 The marine environment is also unique in that the majority of the individual heritage assets that reside within it, such as the remains of ships and aircraft - due to their transient nature - retain stories of the crew, vessel construction, trade, immigration, emigration and conflict. These individual elements have the potential to link numerous geographical locations, both on land and at sea. Shipwreck sites in particular hold value and significance in many ways, and are linked to many places. Any such discoveries are therefore likely to be of interest to the public and provide excellent opportunities to engage with local audiences and communities through outreach and educational programmes. The scale of the proposed project could potentially bring opportunities to inform a broader collective understanding of heritage, be it prehistory or though military remains for instance, which could be drawn upon and expressed for Suffolk communities and the broader region to learn about.	Noted.
064	5.1.24 We therefore feel the applicant would need to consider in more detail how the scheme can address wider public benefits, and how they will develop academic research and create joined-up objectives. In this regard we welcome the stated approach that archaeological information generated by survey and other mitigation measures will be used to contribute to the gradual build-up of knowledge of previously unidentified submerged landscapes offshore. With Section 16.7.3 ' beneficial impact of accumulation of data' in particular including reference to European neighbours and their initiatives and frameworks for submerged	***Section 1.8*** of the ***Outline Offshore WSI*** (APP-583) sets out the Applicants commitment to publication where appropriate. The process of engagement with wider research objectives, including academic connections where relevant will form part of ongoing discussions with Historic England through the SoCG and in finalising the WSI post-consent.

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	archaeological landscapes, which is not an element of an assessment we have seen detailed within an application before.	
065	5.1.25 The cumulative impact section (16.7) however needs to address the likelihood for cable crossing points. This is due to the fact that alongside the consented East Anglia Three development (which includes up to four individual offshore export cables and up to two fibre optic cables), there are a number of other existing cables (as depicted in Figure 6.3) that traverse the study area, which could create areas for which micro-siting may not be possible. Additionally regard to the potential for a centrally located offshore substation, where a number of array cabling converge offers additional risk, for which embedded measures of mitigation may become difficult to accommodate.	Whilst crossing cables may reduce the ability to implement micro siting it should be noted that crossing locations would still have to adhere to the commitments secured through the ***draft DCO*** (APP-023) (including the Outline WSI (Offshore) and Design Plan). If, however, pre-construction surveys identify areas where micro-siting options may not be available, the Applicants would liaise with the MMO and the statutory historic body. This would also apply in relation to the siting of the offshore substation(s).
5.2 Oceanography and Physical Processes – Document Reference: 6.1.7		
066	5.2.1 The approach to micro-siting will need to carefully consider the evidence obtained from the pre-construction surveys that are planned, as well as the limitations in the approaches used, and the data that will be collected. In addition, the impact that changes to coastal processes may have on heritage assets needs to be discussed in more detail. Heritage assets are briefly mentioned in Table 7.43 (EA1N & EA2) in the Marine Geology, Oceanography and Physical Processes chapter (Ch7), but the details of the embedded mitigation strategy set out in this chapter needs to be discussed with heritage in mind (either in Chapter 7 or in Chapter 16), such as the use of scour protection (Chapter 7, Section 7.6.2.4).	The impact that changes to coastal processes may have on heritage assets are discussed in detail as part of the assessment of ***Chapter 16 Marine Archaeology and Cultural Heritage*** (APP-064) (***sections 16.5.6*** and ***16.6***). Similarly embedded mitigation specific to ***Chapter 7 Marine Geology***, ***Oceanography and Physical Processes*** (APP-055) also forms part of the considerations for heritage in ***Chapter 16***, for example in terms of sea bed preparation and scour protection, discussed as part of the worst case scenario in ***section 7.5.8*** which in turn informs the assessment of impacts for archaeology and cultural heritage.
067	5.2.2 It is stated in Section 7.3.4 that monitoring will form a major part of the management strategy (EA1N paragraph 63 & 64 EA2), and we note Section 1.6.10 'Marine Archaeology and Cultural Heritage' and Table 1.4 in the project specific In principle Monitoring Plan (ES document: 8.13) in this	Noted.

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	regard. With specific requirements relating to monitoring during post-construction (including a conservation programme for finds) as detailed in the Outline Written Scheme of Investigation (Offshore) – document: 8.6. Notably the ES states that the reporting Protocol for Archaeological discoveries (PAD) shall be followed during all intrusive works.	
5.3 Offshore In-Principle Monitoring Plan - Document Reference: 8.13		
068	5.3.1 Table 4 'In Principle Monitoring Proposed – Offshore Archaeology and Cultural Heritage', under the column heading 'Monitoring Proposal', reference is made to "The WSI includes provision to update the document as the project design is refined and as the results of further archaeological assessment become available". As such this should be amended to read "The Outline WSI includes provision to update the document as the project design is refined and as the results of further archaeological assessment become available. With the final agreed WSI acting as a 'point-in-time' document and submitted to the Marine Management Organisation (MMO) 6 months in advance of the licensed activities".	Noted.
5.4 Offshore Windfarm Archaeology and Cultural Heritage Outline Written Scheme of Investigation (Offshore) - Document Reference: 8.6		
069	5.4.1 It is acknowledged that this is an outline (offshore) Written Scheme of Investigation (WSI), and that the final offshore WSI will be developed post-consent in consultation with Historic England and the Suffolk County Council Archaeological Service (Section 1.1.3).	Noted.
070	The outline strategy presented in this document appears to be sensible and appropriate but we look forward to seeing the detailed WSI subject to consent being granted. It is also acknowledged that the area of the proposed development has the potential to contain remains of archaeological and historic interest: a number of the sediment units have	Noted.

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	the potential to contain archaeological and palaeoenvironmental remains of interest (Section 1.2.2), and over a 800 (EA2) and 500 (EA 1N) features (classed as either A1, A2 or A3 anomalies) have been identified as part of the geophysical survey work, ranging from magnetic anomalies to previously known wreck sites (Section 1.2.3).	
071	5.4.3 In order to fully account for impacts to heritage assets discovered in the preconstruction planning and clearance work that pose a development constraint, we recommend the offshore Outline WSI consider in greater detail appropriate mechanisms to ensure effective archaeological work is supported through a phased approach. Furthermore, should the remains investigated under such provisions prove to be of exceptional national importance - an extension of the period of time available must be afforded for a more detailed evaluation, in doing so this will enable a clearer understanding of their significance and likely extent. The results would therefore inform where a need to potentially preserve such remains in situ is necessary (through a revised engineering design where feasible), or allow a period commensurate with the construction timetable, for archaeological works in accordance with CIFA standards and guidance, and other relevant expert advice.	Further consideration of appropriate phasing and scheduling will be discussed as part of the SoCG process and during engagement on the final WSI. This will allow for the effective integration of archaeological considerations as part of the design process post-consent.
072	5.4.4 We feel this approach aligns better with EN-1, paragraph 5.8.22 whereby should there exist a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, then requirements for appropriate procedures for the identification and treatment of such assets should be considered.	Noted.
073	5.4.5 Ideally a strategy for heritage assets (artefacts, structures, deposits of archaeological interest) encountered early on in the design planning phase should consider limiting delays in carrying out necessary archaeological work. This is to account for discrete and sensitive remains	Noted. As above, further consideration of appropriate phasing and schedule, to allow for the effective integration of archaeological considerations as part of the design process post-consent, will be

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	and deposits, so that they can be protected and/or sampled in a timely manner in order to mitigate any damage, degradation or the potential loss of the remains.	discussed as part of the SoCG process and engagement on the final WSI.
074	5.4.6 We note that paragraph 95 of the outline offshore WSI states that an archaeological watching brief may be required in areas subject to clearance which are considered of medium or high archaeological importance. The watching brief approach has worked effectively on other offshore wind farm projects, notably EA1 in relation to small and isolated remains. However we request that greater detail is included in this particular instance to define what areas of high or medium importance are. Given the scale of past sea and airborne activity, it may be more reasonable to assume it relates to archaeological potential, which could come down to a multitude of contributing factors, such as large extended sand wave features (of notable heights and wavelengths – as picked up on in Chapter 16, paragraph 106, EA2 and 105 of EA1N) concealing archaeological remains, and where large quantities of seabed and sub-seabed anomalies have been recorded. Moreover, potential may also coincide with areas where micro-siting may not be altogether feasible. In particular should the proposed Northern Export Cable Route be the preferred option (Plate 6.10 of Chapter 6 'Project Description') for the EA Two and EA One North projects, the distances between individual export cables, proposed (50m) together with the indicative distance between each project's pair of export cables (500m) – inclusive of working buffers – may present such an area of risk.	Noted. Areas of low, medium or high importance (archaeological potential) would be defined based upon the pre-construction survey data and in consultation with Historic England. This will be further clarified in the updated Outline Offshore WSI at Deadline 3.
075	5.4.7 The introduction of the proposed wind farm alongside the consented parameters of the East Anglia Three OWF development which includes up to four individual offshore export cables and up to two fibre optic cables, as well as other existing cables (as depicted in Figure 6.3), could generate	Noted. Where micrositing is not possible, the Applicants have committed to further investigation and additional mitigation measures (as detailed in the ***Outline Offshore WSI*** (APP-583). Also see response to ID 051 and 065 of this table.

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	additional areas for which micro-siting may not be possible, within the array areas in particular.	
076	5.4.8 Recent successful surveys undertaken on the EA1, the use of 'Pulse Induction' system (such as TSS 440 Pipe and Cable Survey System) or similar, to detect any type of conductive material – including non-ferrous metals - should be considered as part of any evaluation strategy. As this may enable the possibility to account for potentially significant archaeological material, otherwise undetectable by standard means of surveying, such as dispersed and buried military aircraft remains, or discreet shipwreck material.	Noted. This will be discussed as part of evaluation strategy to be established post-consent and detailed in the final Offshore WSI.
077	5.4.8 Paragraph 76 of the WSI states that it is possible that certainty as to the nature and extent of individual anomalies (A2s) may only be achieved through the use of drop down cameras or diver/ROV survey. We feel that the use of drop down cameras for the identification of archaeological sites has yet to be proven as an investigative technique, within a development context in English waters. Therefore we would wish to see further explanation of methods and suitability in relation to the identification of heritage assets.	Noted. This will be discussed as part of evaluation strategy to be established post-consent and detailed in the final Offshore WSI.
078	5.4.9 Anticipated timeframes for planned offshore geophysical and geotechnical survey works should be included within any post-consent WSI, to outline information as to the staging and reporting in relation to archaeological mitigation.	Noted. This will be detailed post-consent in the final Offshore WSI.
079	5.4.10 We note the applicant is aware of the limitations of the surveys carried out so far, such as the line spacing's used for the SBP and Magnetometer surveys (Section 1.5.1, paragraph 53). It is acknowledged that smaller palaeolandscape features may be present in the areas between the surveyed corridors for SBP and Magnetometer, and that	Noted. As stated above, the ***Outline Offshore WSI*** (APP-583) recommends that a data review is undertaken post-consent to qualify the continued suitability of the existing data and assessment to the project, identify data gaps and inform the acquisition of further geophysical data before the start of the pre-construction phase (para. 57).

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	additional surveys may be carried out at post-consent (Section 1.5.1, paragraph 55-57). It is also acknowledged that not all archaeological remains are readily identifiable through geophysics survey, and that this will be taken into account when planning subsequent phases of survey work (paragraph 62).	
080	5.4.11 Geoarchaeological approaches will be utilised to evaluate the potential of sediment sequences to preserve archaeological and palaeoenvironmental evidence. We are pleased to see that provisions will be made for geoarchaeologists to have access to all further geotechnical data acquired for the project (Section 1.5.2 paragraph 66), and that considerations will be given for 'archaeology only' targeted cores to be collected, which would allow specific questions and techniques to be applied, such as OSL dating (paragraph 68).	Noted
081	5.4.12 Section 1.6.3 states that samples obtained as part of the pre-construction works, where deposits suitable for archaeological investigation will be retained, which we support (paragraph 97).	Noted.
082	5.4.13 We recommend the submission to the Archaeological Curator of a Method Statement (as detailed in paragraph 64) is a minimum of 6 weeks prior to the planned commencement of the survey, in order to allow for sufficient time for the review of the Method Statement and any amendments to be completed and agreed.	Noted. This recommendation can be included in the updated ***Outline Offshore WSI*** (APP-583) at Deadline 3.
083	5.4.14 Further detail is required in Section 1.8 'Archaeological Recording, Reporting, Data Management and Archiving' to say how the reporting and publication process will occur. This is in regards to the timeframes for the delivery of reports, submission of OASIS forms and deposition of archives.	Timescales for delivery of reporting and publication will be discussed as part of the SoCG process and additional detail on recommendations can be added to the updated outline Offshore WSI.

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084	5.4.15 Section 1.9 states that a Protocol for Archaeological Discoveries will be implemented to allow for the retrieval and assessment of unexpected discoveries as a means of a 'safety net'. The protocol will need to include training and for the identification of a 'Site Champion(s)' who would be responsible for reporting the discoveries made.	Noted. ***Section 1.9*** of the ***Outline Offshore WSI*** (APP-583) commits the project to the delivery of training and for the identification of a Site Champion(s) on each vessel, or within each worksite team.
6.0 Comments on the Draft Development Consent Order **6.1 Document reference 3.1 (Version 1, dated October 2019)**		
085	6.1.1 The comments are applicable to both the East Anglia Two/East Anglia One North draft Development Consent Orders (DCO) and associated Deemed Marine Licences.	Noted.
086	6.1.2 Schedule 13 Part 2 – Condition 18.—(1) Any archaeological reports produced in accordance with condition 17(1)(g)(iii) are to be approved by the statutory historic body. As such this appears to be an error, as 17(1)(g)(iii) refers to "archaeological analysis of survey data, and timetable for reporting, which is to be submitted to the MMO within four months of any survey being completed;" which we consider should refer to: 17(1)(g)(ii) "a methodology for further site investigation including any specifications for geophysical, geotechnical and diver or remotely operated vehicle investigations;"	The wording of the condition is correct. Condition 18(1) refers to the reports that are subsequently produced in accordance with the timetable submitted to the MMO under condition 17(1)(g)(iii). This is consistent with the wording in the East Anglia THREE Offshore Wind Farm Order 2017. The methodology for further site investigation referred to in Condition 17(1)(g)(ii) is to be included within the offshore WSI which will be submitted to the statutory historic body and the MMO.
087	6.1.3 Schedule 14, Part 2, Condition 13(1)(g) a provision for "(ii) details of coastal interface;" is included. As such, this is the first time Historic England has seen this within a Deemed Marine Licence, and whilst we can speculate upon its function and meaning we would like its inclusion to be clarified.	Historic England have previously fed back concerns over the coastal zone being overlooked where separate onshore and offshore WSIs are produced and therefore this text was included to make it clear that the offshore WSI will consider the coastal interface.

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088	6.1.4 To ensure a joined up approach on the foreshore between Historic England and Suffolk County Council the relevant offshore transmission assets Schedule 14, Part 2, Condition 13(1)(g) would benefit from being amended as follows: *"(g) A written scheme of archaeological investigation in relation to the offshore Order limits seaward of mean high water, which must be submitted to the statutory historic body at least six months prior to commencement of the licensed activities and to the MMO at least four months prior to commencement of the licensed activities and which must accord with the outline written scheme of investigation (offshore) and industry good practice, in consultation with the statutory historic body* ***(and, if relevant, Suffolk County Council)*** *to include—"*	The Applicants will discuss this request through the SoCG process with Suffolk County Council.
6. Conclusions **6.1 On-shore historic environment**		
089	6.1.1 As set out above our principal concern is the impact of the proposed substations for EA1N and EA2 on the significance of the grade II* listed Church of St. Mary at Friston. This is individually and then cumulatively when combined with each other and with the additional National Grid infrastructure. We therefore wish to object in principle to the development of the substations for both schemes. Please note that we do not object to the overall principle of the development, particularly in relation to the siting of the turbines (see offshore comments), landfall or cable route.	Noted.
090	6.1.2 The church is an important, highly-graded designated heritage asset which lies on the northern edge of Friston village. It is appreciated in a rural and largely open landscape enabling views from the south and north,	Noted.

ID	Written Representation	Applicants Comments
	which both enhances its prominence and adds to the appreciation of the building. The landscape that surrounds the church therefore forms part of its setting and contributes to its significance.	
091	6.1.3 We believe the scale and appearance of the proposed development, and its location just to the north of the church would significantly change its character and its rural landscape setting. Historic England have assessed the application using the material provided by the applicant and our own judgement and consider the development of the substations, both individually and cumulatively would result in a harmful impact upon the significance of the grade II* church. In EIA terms we would see the development as resulting in a significant effect and a major adverse change. We would consider this to be harm of a very high degree in terms of the NPPF policies, but less than substantial harm.	The Applicants disagree with this assessment and refer to their comments in preceding rows (see rows 003, 004 and 032)
092	6.1.4 We accept the effects and impacts would vary between EA1N and EA2 depending on the viewpoints, upon the efficacy of the mitigation and between the different types of infrastructure proposed (AIS and GIS substations). We believe however that the substations would not be mitigated successfully in some key views, and the substation developments, and the mitigation its self is potentially harmful in the way that it would alter the immediate environment of the church. The interruption of the critical views from the north and the loss of prominence of the church in the landscape are also of particular concern.	Historic England notes here that the mitigation measures proposed by the Applicants are themselves potentially harmful. This issue is not raised earlier in the Written Representation and further clarity is required regarding the evidence in support of its position, other than to note here that it would alter the immediate environment of the church. The Applicants also refer to their comment in row 040 of this table regarding the trade-off between potential landscape and visual impacts and potential cultural heritage impacts.
093	6.1.5 We are aware that the proposal is likely to result in harm to other designated heritage assets and although this assessment was outside of our remit. We would anticipate the examining authority would need to consider the impact upon the historic environment as a whole.	

ID	Written Representation	Applicants Comments
094	6.1.6 We are aware of concerns raised by the Council and Local Authority in relation to the efficacy of the mitigation planting, and in terms of proposed growth rates. This is not an area in which we have expertise however our concern is to ensure that any mitigation which is proposed as part of the scheme for the historic environment would deliver an appropriate level of mitigation.	
095	6.1.7 We have offered other points in relation to the on-shore archaeological works, and the Onsore WSI.	Noted.
6.2 Off-shore historic environment		
096	6.2.1 In relation to the off-shore historic environment, the large number of geophysical seabed anomalies recorded within the PDA highlights the potential for significant historic environment features to be present. Our concern here is therefore to ensure that the Outline Offshore Archaeological Written Scheme of Investigation considers how the construction can be designed sensitively to take into account known and potential heritage assets.	Noted. The approach set out in the ***Outline Offshore WSI*** (APP-583) will be discussed further as part of the SoCG process to ensure that construction will be designed sensitively to take this into account.
097	6.2.2 We have identified that the resulting proposals of embedded and additional mitigation - through schemes of investigation have the potential to successfully mitigate impacts to the historic environment through avoidance, but these present opportunities to better reveal the significance of the heritage assets found within the proposed development area	Noted. The approach set out in the outline Offshore WSI will be discussed further as part of the SoCG process to ensure that opportunities to better reveal the significance of the heritage assets within the proposed development area are provided appropriate consideration.

2.8 Marine Management Organisation

ID	Written Representation	Applicants Response
001	N/A	The Applicants note that the Marine Management Organisation (MMO) has not submitted a Written Representation other than a summary of their relevant representation and responses to the ExA's first written questions. The Applicants refer to the Statement of Common Ground with MMO (REP1-080) submitted at Deadline 1 and will continue to engage with the MMO on the matters still marked as 'in discussion'. In addition, the Applicants have provided comments on the MMO's responses to the ExA's first written questions (ExA.WQRs.D2.V1).

2.9 National Grid Energy Transmission

ID	Written Representation	Applicants Comment
001	National Grid Plc does not object to the development proposed by the Applicant. The DCOs seek consent to deliver infrastructure that will be owned and operated by National Grid Electricity Transmission ("NGET"). That infrastructure includes a new NGET substation and the DCOs include flexibility for either a AIS or a GIS substation to be implemented should the DCOs be approved. NGET supports this flexibility as, the ability for NGET to choose which type of substation to implement will to assist NGET in complying with its statutory duty under Section 9(2) of the Electricity Act 1989 to "develop and maintain an efficient, co-ordinated and economical system of electricity transmission".	Noted.
002	As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the Order Limits of the proposed development. NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.	The Applicants have fully engaged with National Grid Electricity Transmission (NGET) and continues to liaise with NGET with a view to reaching agreement on protective provisions for inclusion in the Development Consent Order (DCO) that will protect NGET's interests.
003	NGET can confirm that it is liaising with the Applicant in relation to the protective provisions included within the DCOs to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examinations.	The Applicants continue to liaise with NGET with a view to reaching agreement on protective provisions for inclusion in the DCO that will protect NGET's interests.

ID	Written Representation	Applicants Comment
004	NGET own and maintain the electricity transmission network in England and Wales. National Grid ESO operate the transmission network across the UK. NGET is required to comply with the terms of its Electricity Transmission Licence in the delivery of its statutory responsibility. Under Section 9 of the Electricity Act 1989, NGET have a statutory duty to maintain 'an efficient, co-ordinated and economical' system of electricity transmission.	Noted.
005	NGET has a high voltage electricity overhead transmission line located within close proximity to the Order Limits. Details of these assets are as follows: (a) Overhead Power Line 4ZX from 003 to 024, and (b) Overhead Power Line 4ZW from 003 to 024 The overhead line forms an essential part of the electricity transmission network in England and Wales.	It is noted that NGET will be responsible for undertaking works to the noted electricity overhead transmission lines.
006	NGG (National Grid Gas) does not have any Assets within the Order Limits.	Noted.
007	In respect of all NGET infrastructure located within the DCO boundary, or in close proximity to the proposed project and associated works, NGET will require protective provisions to be put in place to ensure (i) that all NGET interests and rights including rights of access to Overhead Power Lines and other apparatus are unaffected by the power of compulsory acquisition, grant and extinguishment of rights and temporary use powers and (ii) to ensure that appropriate protection for the retained apparatus is maintained during and after construction of the project in accordance with the Protective Provisions and the relevant safety standards as set out in paragraph 5. National Grid also require 24 hour access to all assets listed	The Applicants continue to liaise with NGET with a view to reaching agreement on protective provisions for inclusion in the DCO that will protect NGET's interests.

ID	Written Representation	Applicants Comment
	at 2.1 throughout the construction and operation of the Authorised Development and will liaise with the Applicant to ensure this is maintained.	
008	As per Table 20.3 of the East Anglia ONE North Environmental Statement (document reference 6.1.20), we note that the Applicant retains the option to install further attenuation measures along the existing surface water flow route during the detailed design phase. The Applicant has committed to providing an additional 'surface water management SuDS basin' (currently identified as concept within Chapter 29 Landscape and Visual Impact Assessment, and in the OLEMS (document reference 8.7) to reduce water in-flow rates to the substation area and potentially reduce flood risk for the village of Friston, in addition to the Surface Water Drainage Strategy currently proposed.	Noted.
009	Confirmation of the size, volume and location of this additional 'surface water management SuDS basin' will follow establishment of an appropriate catchment hydraulic model and the detailed design of the onshore substation and National Grid substation. As a result, the additional attenuation and wider catchment benefit associated with this proposed additional 'surface water management SuDS basin' is not therefore incorporated within this chapter and is therefore a worst-case scenario. NGET will contribute to the design of these further attenuation measures which must ensure that the operation of the proposed NGET infrastructure being consented is not compromised.	Noted, the Applicants welcome further discussions and working with NGET on this going forward.
010	The Applicants and NGET will liaise during the detail design of the surface water management system which is on-going to ensure that the design satisfies the requirements of the Outline Operational Drainage Management Plan and to ensure that the operation of the authorised development (including the National Grid infrastructure and the Projects' onshore substations) are not compromised. NGET understands that the	Noted, the Applicants welcome further discussions and working with NGET on this going forward. A draft Outline Operational Drainage Management Plan will be shared with NGET for comment, and a final Outline Operational Drainage Management Plan will be submitted at Deadline 3.

ID	Written Representation	Applicants Comment
	Applicant is currently preparing the Outline Operational Drainage Management Plan and that this will be reviewed by NGET prior to its formal submission to the examining authority during the examination.	
011	As the Project provides for a new National Grid substation and connection to the National Grid, National Grid would ordinarily expect the promoter to enter into a Side Agreement to secure those matters at paragraph 8(c), as well as securing that prior to construction the parties enter into an agreement to address transfer of benefits, an interface agreement in connection to construction and connection and acquisition of all necessary land rights. Negotiations are currently continuing between the parties in respect of these commercial matters. Once resolved and agreed protective provisions are in place, National Grid will be in a position to remove their Representation.	The Applicants continue to liaise with NGET with a view to reaching agreement on protective provisions for inclusion in the DCO that will protect NGET's interests.
012	NGET have issued guidance in respect of standards and protocols for working near to Electricity Transmission equipment in the form of: 5.1.1 Third Party Working near National Grid Electricity Transmission equipment - Technical Guidance Note 287. This document gives guidance and information to third parties working close to National Grid Electricity Transmission assets. This cross refers to statutory electrical safety clearances which are used as the basis for ENA (TA) 43-8, which must be observed to ensure safe distance is kept between exposed conductors and those working in the vicinity of electrical assets, and Energy Network Associations Development near Overhead Lines ENA (TS) 43-8. This sets out the derivation and applicability of safe clearance distances in various circumstances including crossings of OHL and working in close proximity. Additionally, HSE's guidance note 6 "Avoidance of Danger of Overhead Lines", summarises advice to minimise risk to life/personal injury and	The Applicants continue to liaise with NGET with a view to reaching agreement on protective provisions for inclusion in the DCO that will protect NGET's interests.

ID	Written Representation	Applicants Comment
	provide guidance to those planning and engaging in construction activity in close proximity to Overhead Lines. National Grid requires specific protective provisions in place to provide for an appropriate level of control and protection for retained assets and assurance that industry standards will be complied with in connection with works to and in the vicinity of their electricity assets.	
013	NGET assert that maintaining appropriate property rights to support their assets and protecting these from Compulsory Acquisition and related powers in the DCO is a fundamental safety issue. Insufficient property rights would have the following safety implications: • Inability for qualified personnel to access apparatus for its maintenance, repair and inspection. • Risk of strike to buried assets/cable/overhead lines if development occurs within the easement zone which seeks to protect the cable/overhead lines from development. • Risk of inappropriate development within the vicinity of the assets increasing the risk of damage to the asset and integrity of the system.	Noted
014	National Grid seeks to protect its statutory undertaking, and insists that in respect of connections and work in close proximity to their Apparatus as part of the authorised development the following procedures are complied with by the Applicant: (a) National Grid is in control of the plans, methodology and specification for works within 15 metres of any retained Apparatus; and (b) DCO works in the vicinity of NGET apparatus are not authorised or commenced unless protective provisions are in place preventing compulsory acquisition of National Grid's land or rights or the overriding or	Noted

ID	Written Representation	Applicants Comment
	interference of the same. Any acquisition of rights must be subject to NGET's existing interests and rights and not contradict with or cut across such rights; and (c) Appropriate surety and insurance provisions are in place to back up an uncapped indemnity to protect National Grid from any damage, losses or claims arising from the Authorised Development.	
015	NGET reserves the right to make further representations as part of the Examination process but in the meantime will continue to liaise with the Applicant with a view to reaching agreement on all matters raised. It is understood that a good level of agreement has been reached in relation to the Protective Provisions although final sign off from the Promoter is awaited. Should it not be possible to reach agreement with the Applicant, National Grid reserve the right to attend a Compulsory Acquisition Hearing or Issue Specific Hearing to address the required format of the Protective Provisions and any necessary amendments to the draft Development Consent Order. If this is necessary National Grid reserve the right to provide further written information in advance in support of any detailed issues remaining in dispute between the parties at that stage.	Noted.

2.10 Network Rail

ID	Written Representation	Applicants' Comments
	1. This is the Written Representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of the application submitted by East Anglia TWO Limited ("Applicant") for a Development Consent Order ("Order") which seeks powers to enable construction and operation of the proposed East Anglia TWO Offshore Windfarm, which comprises up to 75 wind turbines, generators and associated infrastructure ("Scheme"). 2. Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain. 3. The Book of Reference ("BoR") identifies Plots 25 – 30 (inclusive) (Plots) as land in which Network Rail has a property interest and over which compulsory powers to acquire new rights and to acquire land are sought ("Compulsory Powers"). Exercise by the Applicant of the Compulsory Powers would facilitate its ability to undertake Works pursuant to the Order, namely Work No. 13 and Work No. 14. 4. Network Rail considers that there is no compelling case in the public interest for the compulsory acquisition of its rights in land as the Applicant and Network Rail should instead negotiate matters by private agreement. 5 Network Rail is now in active discussion with the Applicant to secure legal arrangements whereby Network Rail's interests which it requires protecting are not prejudiced by the exercise of any compulsory acquisition powers by the Applicant over the Plots. Network Rail looks forward to working with the Applicant so that a position may be secured whereby Network Rail might be able to withdraw its objection. However, until such agreement is in place, Network Rail is unable to withdraw its	The Applicants will continue discussions with Network Rail to secure legal arrangements that protect Network Rail's interests with a view to Network Rail reaching a position whereby its objection can be withdrawn.

ID	Written Representation	Applicants' Comments
	objection to the Order. We anticipate being in a position to update the Examining Authority further in the course of the next few weeks.	

2.11 NNB Generation Company – Sizewell C

ID	Written Representation	Applicants Comment
001	Statement of Common Ground We can confirm that a draft Statement of Common Ground (SoCG) has been agreed with Scottish Power Renewables (SPR) in relation to both EA1N and EA2. SPR will submit the draft SoCG as part of their response to Deadline 1. The outstanding matter relates to the protective provisions that SZC Co. has requested for inclusion in the Development Consent Orders. We will continue to discuss this with SPR over the coming weeks and hope to submit a final SoCG into the examination at another deadline.	The Applicants have submitted an agreed draft SoCG with NNB Generation Company (SZC) Limited (REP1-061) at Deadline 1.
002	Errata We would like to bring to the ExA's attention errors in the Additional Submission document AS-037 'Applicant's Comments on Relevant Representations Volume 4: Landowners'. In response to RR-038 (Page 3), it identifies EDF Nuclear Energy Generation Limited as having an interest in plot numbers 28, 29, 30, 31, 35, and 39 (in relation to the October 2014 Option Agreement). We can confirm that SZC Co. are the beneficiary of this option agreement rather than EDF Nuclear Energy Generation Limited.	With regards to the respondent's comments in respect of Plots 28, 29, 30, 31, 35 and 39, the Applicants thank NNB Generation Company (SZC) Limited for clarifying the position. This was an error but for the avoidance of doubt, EDF Energy Nuclear Generation Limited is not listed as an interested party in the Book of Reference in respect of these plots.

2.12 Norfolk County Council

ID	Written Representation	Applicants' Comments
01	Norfolk County Council has consistently supported the principle of offshore renewable energy proposals, which are felt to be compatible with national renewable energy targets and objectives.	The Applicants welcome the comments from Norfolk County Council in support of the principle of offshore renewable energy.
02	Neither of these projects make landfall in Norfolk and as such it is unlikely that these proposals will have any immediate impacts on Norfolk in terms of landscape, ecology and archaeological matters. Furthermore, it is not felt that there will be any significant transport impacts on Norfolk arising from either the construction or operation of the onshore infrastructure.	No further comment.
03	While Norfolk County Council welcomes the potential employment opportunities these offshore proposals will have within the local/regional area both during construction and once operational, there are significant economic issues, which these proposals will need to address with regard to: (a) The cumulative impacts on the local labour market; and supply chain (i.e. taking into account other planned NSIPs e.g. Sizewell C; Norfolk Vanguard Offshore Wind Farm; Hornsea Project Three; and Boreas Offshore Windfarm). (b) Developing a local skills strategy to ensure there are sufficient skilled workers. Norfolk County Council would especially welcome measures that will enable permanent, long term job opportunities to be taken up by local people; and (c) The County Council would support measures that would encourage/enable people currently excluded from the formal labour market to be supported into jobs at any level/degree of permanency.	The Applicants have previously provided a response on the points raised by Norfolk County Council within the **Applicant's Comments on Relevant Representations - Volume 3: Technical Stakeholders (AS-036),** submitted at Deadline 0. Recent activity under the Applicants' Skill Strategy includes but is not limited to supporting a further 13 places at the East Coast College Offshore Wind Skills Centre on the introductory and transition training offering and also completing the recruitment of the first SPR Offshore Apprentices. Both candidates joined SPR early in November 2020 and commenced training at East Coast College. The Applicants work closely with the supply chain, training providers, developers and operators within the region to work collaboratively to ensure that sustained training routes are established to support long term employment. All industry groups such as Skills for Energy provide an open platform for discussion on these topics. The Applicants have created entry level opportunities within SPR for apprentices. Discussions are ongoing with the local Department for Work

ID	Written Representation	Applicants' Comments
		and Pensions to create an outreach project specific to supporting local individuals currently unemployed
04	It is felt that given the proposals' proximity to Norfolk and the likelihood of additional major construction projects in both Norfolk and Suffolk arising from the offshore wind energy sector and Nuclear sector (as outlined above), the DCO needs to have a planning requirement setting out the need for an "education, employment and skills strategy" – to be prepared by the applicant.	The Applicants' have previously provided a response on the points raised by Norfolk County Council within the **Applicant's Comments on Relevant Representations - Volume 3: Technical Stakeholders (AS-036),** submitted on the 11th of June.
05	There are wider grid connection issues in respect of the 400kV network which runs between Norfolk and Suffolk. It is considered that as part of the DCO application there needs to be clarification on whether there is likely to be any requirement in the wider area for either: (a) reinforcement of the existing 400 kV network; or (b) new overhead lines (400kV). There is a further need to take into account the current Offshore Transmission Network Review being led by the Department of Business, Energy and Industrial Strategy. Given the amount of electricity coming ashore from other offshore wind energy projects and the increased generation from Sizewell C, the DCO application and accompanying ES will need to address the in-combination impact on the 400 kV transmission network in the wider strategic area i.e. including the potential for reinforcement and new lines in both Norfolk and Suffolk.	The Applicants' have previously provided a response on the points raised by Norfolk County Council within the **Applicant's Comments on Relevant Representations - Volume 3: Technical Stakeholders (AS-036),** submitted on the 11th of June.

2.13 Office for Nuclear Regulation

ID	Written Representation	Applicants Comment
001	ONR has consulted with Suffolk County Council's Emergency Planner who has confirmed that the on-shore developments are able to be accommodated within the Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) 2019 off-site emergency plan for the Sizewell B nuclear licensed site provided the following planning conditions are included in any planning consent: No part of the preparation or construction works shall commence until emergency plans relating to these activities have been agreed and issued. Emergency plans cover the EDF Energy Sizewell B Operators emergency plan and the Suffolk County Council Off Site Emergency Plan issued under REPPIR 2019. Wider civil contingency arrangements include Suffolk Resilience Forum emergency plans for identified risks issued under the Civil Contingencies Act 2004 that might affect the Sizewell C main development site and any associated infrastructure. 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.	As noted in the SoCG with ONR (REP1-066) submitted at Deadline 1, the Applicants acknowledge the importance of the Sizewell Off Site Emergency Plan but do not agree with the wording of the proposed Requirement. The Applicants will continue to liaise with the Suffolk Joint Emergency Planning Unit to resolve this matter.
002	As both developments have the ability to present external hazards to the Sizewell B nuclear licensed site (and the Sizewell C main development site) ONR: Has confirmed that that the hazards presented by the windfarm developments are within the scope of the Sizewell B existing safety case and on-site emergency arrangements. Notes that the timescales for construction/operation of the windfarms overlaps with the planned construction/operation timescales for the	As noted in the SoCG with ONR (REP1-066) submitted at Deadline 1, the ONR has discussed this matter with Sizewell B and is content (on the basis of information on the Projects available to date) that no new hazards are presented or are already adequately addressed by Sizewell B's existing safety case. Furthermore, Sizewell B has an ongoing dialogue with the Applicants, allowing Sizewell B to manage any emergent risk from the Projects.

ID	Written Representation	Applicants Comment
	Sizewell C site and the need for the future Sizewell C licensee to make any allowances necessary to accommodate the windfarm developments in the safety case for the site.	The Applicants note ONR's position on the SZC DCO Application. The Applicants will continue to liaise with SZC during the development of the proposed Sizewell C New Nuclear Power Station to ensure that any necessary information on the Projects is provided to SZC in the future for the preparation of the Sizewell C safety case and onsite emergency plan.
003	There is a legal expectation of the Infrastructure Planning (Environmental Impact Assessment) Regulations for projects of this nature that the potential cumulative environmental effects of projects in the surrounding area are considered. In this respect, we highlight the decommissioning project at the nearby Sizewell A licensed nuclear site. Given this, we recommend that Magnox Ltd is included as a consultee in the project. The scoping report indicates that EdF is the owner of Sizewell A. We highlight that Magnox Ltd own Sizewell A and EDF Energy owns Sizewell B.	The Applicants are progressing a joint SoCG with Magnox Limited and the Nuclear Decommissioning Authority (NDA).
004	Footnote: ONR is a statutory consultee under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The intent of these regulations is for Environmental Impact Assessments to include an assessment of the vulnerability of developments to risks of major accidents and/or disasters and the potential of the project to cause a major accident and / or disaster.	No further comment.

2.14 RSPB

ID	Written Representation	Applicants Comment
Protected Sites and Species, The Flamborough and Filey Coast SPA, Alde Ore Estuary SPA, Outer Thames Estuary SPA, Sandlings SPA, Policy and Legislation Background, The Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017, Appropriate Assessment, Environmental Impact Assessment		
000	The Applicants have no comments on these sections of the RSPB's Written Representation.	
Offshore Ornithology		
001	4.1 The RSPB's position on offshore ornithology matters remains as set out in its Relevant Representation in relation to the following: • Habitats Regulations Assessment matters • Environmental Impact Assessment matters • Other matters	The Applicants have responded to the RSPB's Relevant Representation (RR) in AS-036 and will continue engagement with them through the SoCG process.
002	4.2 The RSPB is in ongoing discussions with the Applicant on these matters as part of discussions under the draft Offshore Ornithology SOCG (the draft Offshore SOCG)(see section 1 above and the update section below). We will respond to relevant additional information submitted to the Examination by the Applicant with the aim of refining the draft Offshore SOCG in order to assist the Examining Authority	
Habitats Regulations Assessment Matters		
003	4.3 The RSPB considers there are potential adverse effects on the integrity of the following sites and features. **Flamborough and Filey Coast SPA** • **Gannet**: alone and in-combination effects due to collision risk	The Applicants disagree with the RSPB's conclusions of adverse effects on integrity (AEoI) and signpost to the following submissions: • Response to RRs section 5.7 (AS-036) • The updated cumulative and in-combination collision risk assessment (REP1-047) submitted at Deadline 1; and

ID	Written Representation	Applicants Comment
	• **Kittiwake:** in-combination effects due to collision risk • **Guillemot**: in-combination effects due to displacement • **Razorbill**: in-combination effects due to displacement • **Seabird assemblage**: in-combination effects due to the combined effects of collision risk and displacement on the above species. **Alde-Ore Estuary SPA** • **Lesser black-backed gull**: in-combination effects due to collision risk **Outer Thames Estuary SPA** • **Red-throated diver**: in-combination effects due to displacement	• The updated cumulative and in-combination auk displacement tables submitted at Deadline 2 (ExA.AS-3.D2.V1) These updated submissions do not alter the conclusions of negligible to minor adverse significance and no AEoI on European sites as assessed in ***Chapter 12 Offshore Ornithology*** (APP-060) and the ***Information to Support Appropriate Assessment Report*** (APP-043) respectively. Regarding effects on the Outer Thames Estuary SPA qualifying feature of Red-Throated Diver (RTD) the Applicants have been undertaking new analysis of RTD information since the receipt of the RRs. The preliminary findings of this work were presented to the RSPB and Natural England at a workshop held on the 22nd of October. The draft report will be provided to the RSPB and NE in mid-November, ahead of a further workshop in early December to present the results of the analyses and implications for HRA prior to submission of the document at Deadline 3.
Environmental Impact Assessment Matters		
004	4.4 The RSPB considers the cumulative (EIA) impacts are significant in respect of the following impacts on the North Sea populations of the following species: • Collision risk: gannets, kittiwakes, great black-backed gulls, lesser black-backed gulls • Displacement: red-throated divers, razorbills, guillemots	See the Applicants response to ID 003
Other Matters		
005	4.5 Other matters raised in our Relevant Representation that are still under discussion include:	<u>Avoidance rates</u> The Applicants presented results using a range of avoidance rates however, the conclusions of the assessment are based on the avoidance

ID	Written Representation	Applicants Comment
	• Use of an avoidance rate of 98.9% for gannet • Apportioning of lesser black-backed gull collision mortality to the Alde-Ore Estuary SPA • Consented capacity of windfarms	rate of 98.9% for gannet as agreed with Natural England at an ETG meeting on the 20th June 2019, (see ***Table 12.34*** of ***Chapter 12 Offshore Ornithology*** (APP-060). The Applicants note that Natural England acknowledges that a higher avoidance rate of 99.5% for gannet has been recommended by Bowgen & Cook (2018) and that this would significantly reduce the cumulative total. Natural England and the other SNCBs are currently considering their response to the recommendations in Bowgen & Cook (2018) and this is expected in early 2021. Apportioning of Lesser Black-Backed Gull The Applicants have provided an updated apportioning methodology in the updated cumulative and in-combination collision risk assessment (REP1-047). Consented Capacity of Windfarms The Applicants have provided their position on this within the Offshore Ornithology Precaution Note (AS-041) and the Applicants' position is unchanged. However, given the decision agreed by the Applicants, NE and RSPB at a workshop on the 28th of July to adopt the in-combination estimates agreed in the Norfolk Boreas examination, the Applicants do not intend to make further comment on this matter.
Offshore Ornithology Statement of Common Ground update		
006	4.6 The RSPB is in ongoing discussions with the Applicant on the draft Offshore SOCG. Due to the serious resource limitations referred to in our Relevant Representation, the RSPB was unable to provide comments to the Applicant on the latest iteration of the draft Offshore SOCG in time for Deadline 1.	No further comment

ID	Written Representation	Applicants Comment
007	4.7 As set out in our Relevant Representation, our aim is reduce significantly the areas that remain "In discussion" in order to provide clarity to the Examining Authority on those areas where we agree or do not agree with the Applicant.	No further comment
008	4.8 Our key concern remains that the derogation tests under the Habitats Regulations are properly explored and tested through the Examination. Therefore, our main focus for future discussions with the Applicant, other stakeholders and through the Examination is on these matters, with particular emphasis on any compensation measure proposals put forward by the Applicant.	The Applicants have been engaging with the RSPB on this matter ahead of submission of the HRA derogations and compensation options documents at Deadline 3.
Onshore Ornithology		
009	5.1 Our comments in this section relate primarily to the following documents: • Document 5.3 Habitat Regulations Assessment - Information to Support Appropriate Assessment Report [Ref. APP-043] • Document 6.1.23 Environmental Statement - Chapter 23 – Onshore Ornithology [Ref. APP-071] • Onshore Ornithology Statement of Common Ground between RSPB and SPR (to be submitted at Deadline 2)	The Applicants are in agreement with the RSPB on Habitat Regulations Assessment and Environmental Impact Assessment Matters, noting this is subject to the additional detail provided in the ***Outline SPA Crossing Method Statement*** (REP1-043) at Deadline 1.
010	5.2 The proposed cable route crosses land within the Sandlings SPA and runs close to both the eastern and western sides of that SPA at either side of this crossing point. The RSPB has therefore raised concerns about potential disturbance and loss of habitat affecting breeding woodlark and nightjar of the Sandlings SPA and turtle dove and nightingale populations associated with the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The RSPB is grateful for constructive engagement during the pre-	No further comment

ID	Written Representation	Applicants Comment
	and post-application phase with the Applicant, during which we engaged in discussions and shared relevant data in order to understand and attempt to reduce the potential impacts. We are therefore pleased that the application includes mitigation proposals including a breeding season restriction on work at the crossing and location of the cable route away from the SPA boundary to reduce disturbance to breeding nightjar and woodlark of the Sandlings SPA and mitigation areas to providing breeding and foraging habitat for turtle doves and nightingales of the Leiston-Aldeburgh SSSI.	
011	5.3 We have raised some remaining concerns during continued discussions with the Applicant about the potential for disturbance and habitat loss to affect SPA and SSSI species during the construction period (both as a result of the project alone and in-combination with other projects). Subsequently, the Applicant has provided further information and clarification regarding the proposed mitigation and timescales for the works; it is our understanding that these documents will be submitted to the Examination. Our detailed comments and updated position can be found in the onshore Statement of Common Ground with the Applicant, as submitted at Deadline 2. We therefore propose not to comment further on onshore issues throughout the Examination, but rather to focus our limited resources on covering our significant concerns with potential impacts relating to offshore ornithology (see section 4).	The Applicants note that the onshore SoCG with the RSPB has been submitted to PINS. The offshore SoCG will be submitted at Deadline 3.

2.15 Substation Action Save East Suffolk

5. The Applicants note submissions made by Substation Action Save East Suffolk (SASES) at Deadline 1 covering 18 different topics. The Table below provides the Applicants' comments on SASES' summary of their written representations. These are headline responses only. The Applicants intend to respond to SASES' detailed submissions, as appropriate, at Deadline 3 or Deadline 4 as specified in the table below.

6. SASES have chosen not to engage in the SoCG process until after Deadline 1. The SASES submission at Deadline 1 therefore represents the first opportunity the Applicants have had to consider their detailed comments. Since submission of the Applications in October 2019, the Applicants have progressed discussions with other stakeholders and statutory bodies through the SoCG process and a number of matters have been progressed through the production of further clarification notes submitted at Deadline 1 and Deadline 2. Consequently, a number of the matters raised by SASES will need to be reviewed in light of the progress made in respect of the Projects since the applications were submitted, rather than the position at the time of the Applications.

ID	Written Representation	Applicants' Comments
01	<u>Site Selection</u> SASES's case is that the site selection process which has resulted in the identification of Friston as the site for the connection to the National Grid is wholly flawed. As a consequence, less harmful alternatives have been improperly excluded. The errors in the site selection process are not limited to the Applicant's own process, but also the means by which the grid connection offer from National Grid, which offered a connection in the Leiston area, was not itself the subject of proper assessment. A further broader alternative arises from the Government's intention to seek better coordination of grid connections for renewable energy projects which is the subject of an ongoing review which is relevant to these proposals.	The Applicants will respond in detail at Deadline 3. It is the Applicants' position, in accordance with policies set out in NPS EN-1 and based on extensive advice and stakeholder engagement, that the Grove Wood, Friston site offers the most appropriate option for the siting of onshore substations and National Grid infrastructure (section 4.9.1.7 of ***Chapter 4 Site Selection and Assessment of Alternatives***) (APP-052). For site selection, the Applicants engaged in discussions regarding the onshore and National Grid substation site(s) via meetings, site visits and workshops with a Site Selection Expert Topic Group (ETG) from July 2017. These meetings included the monthly project management Local Planning Authority meetings; and at the Suffolk Energy Projects Working Together meetings. The Site Selection ETG comprised Suffolk County

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		Council, Suffolk Coastal and Waveney District Council (now East Suffolk Council), Natural England, Historic England, the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), the Environment Agency and National Grid Electricity Transmission. The Site Selection ETG met on the dates as outlined in ***Table 4.2*** of ***Chapter 4 Site Selection and Assessment of Alternatives*** (APP-.052). The ETG consultation ensured that the site selection process accounted for a wide range of expert, independent advice and was robust. The process was not developed and undertaken solely by the Applicants. It was iterative, and topics, scoring and weighting were agreed through the ETG (see ***Appendix 4.2 - Red Amber Green (RAG) Assessment for Onshore Substations Site Selection in the Sizewell Area*** (APP-443)). It should be noted that Natural England provided the following comment on the site selection process (see ***Appendix 4.1 - Site Selection and Assessment of Alternatives Consultation Responses*** (APP-442). *"As Natural England has been involved in the site selection process, we currently have no further comment on this chapter currently. However, we believe that SPR has adopted a good systematic approach that has allowed for a thorough consideration of alternative options."*
02	<u>Cumulative Impact</u> The Applicant has failed to assess the cumulative impact of other projects together with the proposed development. Importantly, this is a case where the authorised development would directly enable those other projects by the creation of the National Grid connection hub. It is a striking feature of these applications that they seek consent for nationally significant grid connection infrastructure with planned capacity well beyond the needs of the offshore windfarms proposed.	The Applicants will respond in detail at Deadline 3. The selection of other projects to be considered in the assessment of cumulative impacts followed The Planning Inspectorate Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects. Following the guidance in Advice Note 17, the below projects were not considered in the CIA because at the time the Project CIAs were written there was inadequate detail upon which to

ID	Written Representation	Applicants' Comments
	There is no doubt that at least two interconnector projects, and likely two others together with at least two other offshore windfarms, will make a grid connection through the infrastructure which is proposed to be authorised by these DCOs. This is not a case where the effects of a project may be experienced together with some other (unrelated) project, but a case where the proposed development will directly facilitate and accommodate those further developments. Those other projects will bring with them even greater uncertainty as to the duration of construction and significant environmental impacts including through the need for significant additional infrastructure at Friston and multiple cable routes through the AONB. They must be the subject of proper assessment so that the ExA can report on the cumulative adverse effects of the proposals together with other development as required by the EIA Regulations and by EN-1.	base any meaningful assessment (with no information on, for example, the project design, and timescales): • Nautilus; • EuroLink; • Greater Gabbard Offshore Windfarm Extension; and • Galloper Offshore Windfarm Extension. Whilst it is correct that some information is available in the public domain (i.e. on the TEC register) which currently suggests that these projects may connect near Leiston, no detailed plans, programmes or project descriptions exist which would enable meaningful assessment. This was the case at submission of the Applications in October 2019 and remains the case today. Each of the proposed projects is nationally significant and therefore will require its own EIA and as part of that process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Projects (if relevant) in each of their respective EIAs as they progress through the planning process. The Applicants selected the onshore substation and National Grid substation locations to reflect the requirements of the Projects only and did not consider potential expansion of the National Grid substation. As detailed within the ***draft Statement of Common Ground with National Grid Electricity Transmission***: (REP1-063) "*Only National Grid infrastructure required to connect the Projects to the national electricity grid is included within the Applications (specifically Work Nos. 34 and 38 to 43 inclusive)".*
03	Landscape and Visual	The Applicants will respond in detail at Deadline 4.

ID	Written Representation	Applicants' Comments
	Friston has a strong sense of place and local distinctiveness. As noted above the choice of Friston as a location is the result of a flawed site selection process. The Applicant has: a. Materially understated the adverse impact on the landscape and visual receptors; b. Relied upon visualisations which under represent the impact of the development; c. Failed properly to acknowledge that the landscape impact might be prolonged given the site will be a construction site for a substantial period of years depending on how the three NSIPs are sequenced, and failed to have regard to cumulative impacts of creating a new connection hub which will draw other projects to Friston; d. Failed to minimise harm to the landscape through careful design; e. Proposed mitigation proposals which are inadequate not least in relying upon a tree planting regime much of which will not be implemented until after construction is finished and relying on tree growth rates which are unrealistic. Accordingly the proposed schemes are contrary to EN1, EN3 and EN5 in respect of landscape and visual impact.	Since submission of the Applications, the Applicants have been progressing discussions with the Councils on mitigation proposals in order to provide more detail and certainty over these proposals. As outlined in the ***Project Update Note s***ubmitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants have committed to a reduction in the maximum footprint of each onshore substation to 190m x 170m. This represents an approximate 10% reduction in the development footprint of each onshore substation. Further information will be provided at Deadline 3. These reductions allow further refinement of mitigation plans. Further details including a selection of revised photomontages and an updated ***Outline Landscape and Ecological Management Strategy*** (OLEMS) and ***Outline Landscape Mitigation Plan*** (OLMP) will be submitted at Deadline 3 reflecting these changes. Compliance with the National Policy Statements is detailed in the Development Consent and Planning Statement (APP-579).
04	<u>Flood Risk</u> Friston is already vulnerable to and suffers from regular pluvial stormwater run-off flood water and sediment inundation. The proposals result in significant new hard surfacing, infrastructure and ground works which will have an adverse impact on flood risk. Contrary to national planning and energy policies and the local flood management strategy, the Applicant has not considered all forms of flood risk including pluvial and	The Applicants will respond in detail at Deadline 3. Since submission of the Applications, the Applicants have been progressing discussions with the Councils on Flood Risk issues. It should also be noted that the Environment Agency has agreed all matters related to Flood Risk in their SoCG with the Applicants (REP1-077). Surface water (pluvial) and groundwater flood risk has been considered in the Applicants Flood Risk Assessment (APP-496) and assessed in

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	groundwater. That error undermined the site selection process, and it now undermines the adequacy of the assessment of the projects. The ExA should conclude that the proposals are contrary to paragraphs 5.7.9 and 5.7.17 of EN-1. The Applicant proposes detention basins/SuDs ponds to reduce the peak storm flows arriving at the village. These will be above ground level on the downslope and each could contain greater than 10,000m³ of water is creating a significant impoundment risk which has not been assessed. The Applicant does not consider reduction of total flows which is contrary to the wider policy framework not to support development which increases flood risk. Planning policy non-compliance, lack of evidence of viable surface water management schemes, and therefore a demonstrable increase in flood risk mean the schemes cannot be considered permissible under EN-1 and having regard to the adverse effects of the proposals.	section 20.6.2.1 of the ES (APP-068) for the onshore development area. The Applicants are providing additional information at the request of the Councils in order to reach further agreement (SuDS Infiltration Note and Outline Operational Drainage Plan which are discussed below) in the SoCG (ExA.SoCG-2.D1.V2). The Applicants have prepared a ***SuDS Infiltration Clarification Note*** which has been submitted at this deadline (document reference ExA.AS-9.D2.V1). The illustrative design addresses Suffolk County Council's (SCC) request to demonstrate that there is sufficient space within the Order limits of the onshore substation and National Grid substation locations to accommodate infiltration features with a worst case infiltration rate of 10mm/hr and an appropriate factor of safety (LA-005 of the Water Resources and Flood Risk Statement of Common Ground). SCC also requested that the Applicants demonstrate compliance with the SCC guidance for SuDS design (2018) which is addressed in this note. In addition, The Applicants will submit an ***Outline Operational Drainage Management Plan*** at Deadline 3. The Operational Drainage Management Plan will address all operational drainage measures and confirm the final SuDS designs. This includes consideration of existing drains on site and drainage off site via tributaries. There will also be an update to the ***draft DCO*** (APP-023) at Deadline 3 to include a requirement for submission and approval of an Operational Drainage Management Plan. The amendment to the ***draft DCO*** (APP-023) will provide that the Operational Drainage Management Plan must accord with the Outline Operational Drainage Management Plan.
05	<u>Cultural Heritage</u> The substation site is ringed by seven listed buildings including the church of Saint Mary, Friston a Grade II* listed building. These heritage assets do	The Applicants will respond in detail at Deadline 3. Please see the Applicants' response to ExA WQ 1.8.1, 1.8.9 and 1.8.19 (REP1-113) and the ***Archaeology and Cultural Heritage Clarification***

ID	Written Representation	Applicants' Comments
	not exist in isolation and are all part of a significant area of historic landscape which lies immediately to the north of the village of Friston and which is directly and significantly affected by the proposals. The Applicant's assessments underestimate the heritage impact of the proposed schemes and undervalue the contribution made by setting to each of these heritage assets resulting in a much lower assessment of the adverse heritage impact. Furthermore the visualisations are highly selective and do not include key views. On a proper assessment, the harm to designated heritage assets is far greater than that suggested by the Applicant. The ExA and the Secretary of State must have regard to the desirability of preserving the setting of these listed buildings, and in doing so give great weight to their preservation with a presumption in favour of conservation (EN-1, 5.8.14). The setting impacts of the development, by reason of its scale and industrial nature, are towards the upper end of "less than substantial harm". Only the impacts of the operational phase of the schemes are assessed in detail. The failure to include the construction and decommissioning phases is a significant omission and a failure on the part of the Applicant to meet its obligations under paragraph 5.8.10 of EN-1. The outline landscape mitigation plan does nothing to reduce the heritage impacts of the schemes in any meaningful way. In relation to archaeological matters there are significant shortcomings with the baseline archaeological assessment of the onshore development area and accordingly the Applicant is failing in their duty under paragraph 5.8.10 of EN-1.	***Note*** (REP1-021) submitted at Deadline 1 in response to SoCG discussions with the Councils. In order to produce an accurate assessment of the contribution of historical setting to significance, an independent contractor (Headland Archaeology) was commissioned by the Applicants. The subsequent conclusions and narrative provided in ***section 24.6.2.1*** are based on and supported by this independent study (***Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes*** (APP-519)). The Applicants are therefore of the view that an understanding of the historic landscape character has been adequately captured and potential impacts have been robustly assessed. Given the temporary nature of any potential construction and decommissioning impacts upon heritage assets, these phases of the Projects were scoped out of further assessment as explained in ***paragraph 12***, ***Appendix 24.7*** of the ES (APP-519). The Applicants note that this approach has been agreed by the Councils within statement LA-07.05 within the ***Draft SoCG: East Suffolk Council and Suffolk County Council*** submitted to the Examinations at Deadline 1 (AS-046). Further archaeological assessment has been undertaken since the DCO application and reporting on these assessments was submitted at Deadline 1 including: • Pre- Construction Trial Trenching Report (REP1-024); • Onshore Archaeology: Geophysical Survey Report (REP1-025 to REP1-033); and • Onshore Archaeology: Earthworks Report (REP1-034)

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		The Applicants have committed to further pre-construction archaeological surveys (trial trenching) with Suffolk County Council (SCC) Archaeological Service which are anticipated to commence in 2021 (the scope of which is under discussion).
06	<u>Noise</u> Friston benefits from a quiet rural environment particularly at night. The Applicant's assessment of noise impacts both during construction and operation are incorrect. In terms of operational noise an important feature of these applications is that two similar substations will be operated near to each other and the principal source of noise in each will be transformers. Noise from transformers is concentrated at the frequency of 100Hz and when two sounds of properly single frequency are combined it is the sound pressures not the sound intensities that have to be added. The Environmental Statement conclusions, from which the noise limit in the draft DCOs have been derived are based on the background sound level of 29 dBA. It is shown in the baseline noise survey report that the night time background is in the low 20s on many occasions and was measured at less than 17 dBA. On those occasions the tonal noise emitted by the transformers will be clearly perceptible. Based on expert opinion we believe the noise from the Applicant's substations (see comments on the National Grid connection hub below) will be a significant adverse impact of the type which Noise Policy Statement for England seeks to avoid. No cumulative assessment is provided that includes the National Grid connection hub on the grounds that any noise during the operational phase from National Grid infrastructure would be due to switchgear which the	The Applicants will respond in detail at Deadline 4. Please refer to the ***Noise and Vibration Clarification Note*** which has been submitted at Deadline 2 (ExA.AS-8.D2.V1). This note provides further information and clarification the baseline noise survey, the construction phase assessment and the operation phase assessment. As outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants have committed to a reduction in the maximum footprint of each onshore substation to 190m x 170m. This represents an approximate 10% reduction in the development footprint of each onshore substation. Further information will be provided at Deadline 3. An updated ***Outline CoCP*** will be submitted at Deadline 3.

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	Applicant asserts *"are designed to be inherently quiet in operation"*. However it is acknowledged that "*noise from switchgear is impulsive in character*". This assertion should be independently verified. This is particularly important given that the National Grid connection hub will be expanded to enable other offshore energy projects to connect at Friston – see comments on cumulative impact above. EN-1 at paragraph 5.11.9 states that significant adverse impacts on health or quality of life should be avoided and accordingly the proposals are in contravention of the requirements of EN-1. The Applicant's construction noise assessment is also flawed through the use of incorrect criteria arising from a misinterpretation of current standards and guidance. The OCoCP is materially deficient in its treatment of construction noise matters and needs to be revised.	
07	<u>Land Use</u> Contrary to Scottish Power's statement that the operational impact of the authorised projects on land use is minor adverse (see table 21.21 on page 64) in fact it is major and contrary to the requirements of EN-1 which at paragraph 5.10.8 states that *"Applicants should seek to minimise impact on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).* This is due to the very high amount of the best and most versatile agricultural land (grade 2 and 3) being lost at the substation complex site. This loss has been exacerbated by: a. Choosing a sensitive landscape and heritage location where, in an attempt to mitigate the landscape and heritage impacts, a very large and	The Applicants will respond in detail at Deadline 3. Since submission of the Applications, the Applicants have been progressing discussions with the Councils on Land Use. Please see the ***Land Use Clarification Note*** (REP1-022) submitted at Deadline 1. This note summarises the Applicants' approach to the impact assessment methodology and addresses the error in ***section 21.6.2.1*** of ***Chapter 21 Land Use.*** Please also refer to the ***Applicants' Responses to Examining Authority's Written Questions Volume 11 – 1.9 Land Use*** (REP1-114), Q1.9.9 regarding best and most versatile agricultural land.

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	disproportionate amount of the best and most versatile (BMV) land is made over to tree planting/landscaping; b. Choosing a site with a high surface water flood risk which requires BMV land to be made over to SuDs ponds; c. Choosing a site which necessitates the construction of a very long and wide operational access road (1700m x 8m) over BMV land. In contrast National Grid and a Scottish Power own land at the existing Bramford substation site which they have chosen not to develop. Scottish Power has also failed to address the cumulative impact of the further developments that will take place at the substation complex site and in the neighbouring area.	
08	<u>Substation Design & Rochdale</u> The Rochdale Envelope approach adopted by the Applicant has resulted in a development area which may be materially oversized. The consequences of this are particularly significant because of the history of downsizing offshore wind projects with a result that even less land is required. The specific issue here is that the creation of an overly large substation area allows land to become operational electricity undertakers land with future flexibility on the delivery of new infrastructure, potentially in relation to other projects. The applicant's flexibility should be constrained in the DCOs to ensure that (a) the adverse effects of these projects are minimised and (b) that the DCOs do not enable future significant development to come forward without proper scrutiny. The design of the substations needs to be subject to further controls. The parameters of the substations need to be restricted. The National Grid substation should be subject to the outline onshore substation design principles. There should be provision for independent design review by	The Applicants will respond in detail at Deadline 3. The project design envelope has a reasoned maximum extent for the key parameters. The final design would lie within the maximum extent of the consent sought. Post consent, the Applicant will design the onshore substation to the capacity of electricity required to be converted and to accommodate the technology at that time which is available from the supply chain. Furthermore, the final design of the onshore substation and National Grid substation, including the layout, scale and external appearance, is required to be approved by the Local Planning Authority before any work on the substation commences as per Requirement 12 of the ***draft DCO*** (APP-023). The Applicants have submitted an ***Outline National Grid Substation Design Principles Statement*** to Examination at Deadline 1 (REP1-046), and the Applicants will amend the ***draft DCO (***APP-023) at Deadline 3 to require the final details of the layout, scale and external appearance of

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	suitably qualified consulting engineers to ensure that the least harmful feasible design has been proposed when detailed approval is sought under requirement 12 of the DCO.	the National Grid substation to be in accordance with the Outline National Grid Substation Design Principles Statement. As detailed within the ***draft Statement of Common Ground with National Grid Electricity Transmission plc***: (REP1-064) "*Only National Grid infrastructure required to connect the Projects to the national electricity grid is included within the Applications (specifically Work Nos. 34 and 38 to 43 inclusive)".* An update to the ***Outline Onshore Substation Design Principles Statemen***t (APP-585) and ***Outline Onshore National Grid Substation Design Principles Statement*** will be submitted at Deadline 3 to provide further details of the proposed design process. It is the Applicants' intention to progress the detailed design with the Councils in the first instance from early 2021. It should be noted, as outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants have committed to a reduction in the maximum footprint of each onshore substation to 190m x 170m. This represents an approximate 10% reduction in the development footprint of each onshore substation. Further information will be provided at Deadline 3.
09	<u>Footpaths</u> The proposed substation site will necessitate the permanent closure of a well used footpath forming an essential part of a peaceful circular walk from the village. This path is the historic parish boundary between Friston and Knodishall PC and also an ancient "hundred" boundary. The creation of an alternative route is only possible post construction. During construction a number of diversions are shown within the construction site itself which will mean pedestrians having to walk through	The Applicants will respond in detail at Deadline 3. A Public Rights of Way Clarification Note (REP1-049) was submitted at Deadline 1. This note summaries the assessment undertaken regarding PRoW in the ES. The assessment of potential impacts of the Projects on users of PRoW has covered visual amenity, seascape and landscape character (***Chapter 28 SLVA*** (APP- and ***Chapter 29 LVIA*** (APP-076)), in addition to physical and mental wellbeing (***Chapter 27 Human Health*** (APP-075)). Impacts on local businesses and tourism has been

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	a busy and noisy construction site and effectively the northern side of the of Friston will cease to exist as an amenity to residents. During operation the proposed alternative group for FP six runs alongside Grove Road and close to the substation complex. It will not be possible to mitigate effectively the presence of the substation complex with regard to visual impact or noise when using the new footpath. The visual impact will be particularly severe since mitigation planting will be ineffective. There are further 26 public rights of way throughout the onshore development area which will be temporarily closed or diverted for unspecified periods of time. Residents of Friston and the residents of other villages rely on the countryside for recreation and in particular its network of public rights of way. The mitigation proposed is inadequate. Accordingly the Applicant has not properly recognised the importance of the footpath network as a recreational facility. This is contrary to paragraph 5.10.2 and 5.10.24 of EN-1.	assessed in recognition of the PRoW network as a natural local asset (***Chapter 30 Tourism, Recreation and Socio-Economics*** (APP-078)). Together, this forms a holistic view of the potential effects on the PRoW network as a local resource and its users. Temporary diversions and management arrangements must be detailed within the PRoW Strategy (secured under Requirement 32 of the draft DCO (APP-023)) and which must be approved by the relevant planning authority after consultation with the relevant highway authority. An Outline ProW strategy was provided with the Application (APP-581). For PRoW which will be permanently stopped up, as set out in Article 10 of the draft DCO, the existing PRoW cannot be extinguished until the relevant highway authority confirms that the alternative PRoW has been created to the standard defined in the final PRoW Strategy. An updated ***Outline PRoW Strategy*** (APP-581) will be submitted at Deadline 3 alongside an updated ***draft DCO*** (APP-023). An ***Archaeology and Cultural Heritage Clarification Note*** (REP1-021) was submitted at Deadline 1 in response to SoCG discussions with the Councils. This note includes the PRoW and parish boundary within the baseline and considers its influence as an element of the historic landscape character.
10	<u>Human Health</u> These schemes have already caused high levels of anxiety and stress to the local community as is evidenced by over 800 relevant representations objecting to the proposals having been submitted and the open floor hearings scheduled by the Planning Inspectorate having been heavily oversubscribed.	The Applicants will respond in detail at Deadline 3. The Applicants note a range of concerns from the general public regarding human health and recognise that the Project will evoke responses which will vary across individuals. The Applicants have therefore sought to engage with local communities as effectively as possible since the Projects' inception, through a series of public information days (PIDs) (***section 27.2 of Chapter 27 Human Health***

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	The impacts on human health and well-being are not insignificant not least in respect of those of mature age and facing their final years with major disruption and uncertainty. This is contrary to government policy in respect of promoting healthy and safe communities. The health and well-being impacts have not been given due attention by Scottish Power and they must be acknowledged and addressed as required by Section 4.13 of EN-1.	(APP-075)) and other methods (described further in the Consultation Report (APP-029)) in order to communicate and consult on Projects developments as early as possible, as recommended by Public Health England to reduce mental health effects associated with stress, uncertainty and anxiety. The Applicants have sought to assess human health impacts (***Chapter 27 Human Health*** (APP-075)) in accordance with local strategy (e.g. Suffolk's Joint Health and Wellbeing Strategy) and best practice (e.g. the use of data from Public Health England to inform the assessment baseline and using the methodology agreed with Public Health England (section 27.4)).
11	<u>Ecology</u> The following protected species are recorded by the Applicant as being present on the substation site: badgers (4 setts); 15 skylarks; barn owls (I pair); 5 species of bat (common pipistrelle, soprano pipistrelle, serotine, nyctalus noctual, and the rare barbastelle). Grove Wood is being offered as a mitigation habitat but this is now subject to felling licences which is leading to significant tree removal and coppicing, substantially diminishing its suitability as an adequate mitigation habitat. During the lengthy and uncertain construction period all types of wildlife on the cable route will be disrupted and/or displaced. The Applicant's assessment acknowledges that approaching 1/6th of the onshore development area was inaccessible during survey periods, and there is a risk that important features may have been missed. The Applicant does not commit to any enhancement of habitats and only state that "following the construction phase, habitats will be fully reinstated as far as possible" (emphasis added). Contrary to paragraph 5.3.18 of EN-	The Applicants will respond in detail at Deadline 3. The Applicants note that all matters relating to existing environment and assessment methodology (including site specific surveys) are agreed in the SoCGs with both Natural England (REP1-057) and ESC and SCC (REP1-072). Outstanding matters are being discussed with Natural England and ESC and SCC and concern some of the conclusions and proposed mitigation (see the SoCGs for details). In relation to onshore ornithology, Natural England and the Applicants are in agreement on statements in respect of the Existing Environment, Assessment Methodology and Assessment Conclusions. Statements on Mitigation and the DCO remain outstanding and under discussion. For ESC and SCC, some assessment conclusions and mitigation matters are outstanding. Through the SoCG with ESC and SCC (REP1-072), the Applicants have agreed to review and provide clarification on operational noise impacts

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	1 there is no mitigation through enhancement of existing habitats, let alone creation of any significant new habitats. The Applicant's assessment is deficient in a number of respect including failing to comply with paragraphs 5.3.3, 5.37, 5.3.10, 5.3.14 of EN-1. There is a broader concern that the proposed offshore development will be contrary to the Habitats Directive by reason of adverse effects on the integrity of SPAs designated for their seabird interest. SASES reserves its position to participate further on this issue once the position of the relevant conservation bodies is known and considered.	upon ecological receptors (birds and bats). A clarification note will be submitted to the Examination at Deadline 3. For clarity, Grove Wood is not part of the mitigation for the Projects. An area of woodland to the south of Grove will be created as part of the mitigation proposed as part of the Projects. The Applicants have submitted an Onshore Ecology Clarification Note (REP1-023) into the Examination at Deadline 1. The Applicants will submit an updated ***OLEMS*** (APP-584) into the Examination at Deadline 3, which will include a list of the pre-construction ecology surveys to be undertaken. The Applicants have submitted an ***Ecological Enhancement Clarification Note*** (REP1-035) at Deadline 1. The Applicants consider that this document demonstrates how they have considered enhancing biodiversity within the Applications and addresses the concerns raised by SCC and ESC. The Applicants submitted an Outline SPA Crossing Method Statement (REP1-043) at Deadline 1 which addressed many of the outstanding stakeholder concerns on mitigation. Discussions on mitigation at this location will continue. It should be noted, as outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants have committed to a reduction in the maximum footprint of each onshore substation to 190m x 170m. This represents an approximate 10% reduction in the development footprint of each onshore substation. In addition, the Applicants can now also confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction,

ID	Written Representation	Applicants' Comments
		the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information on both of these updates will be provided at Deadline 3. With regard to offshore ornithology matters, the Applicants have been in discussion with Natural England and the RSPB since the submission of the Applications.
12	Transport and Traffic Construction traffic will use the public road network in and around Friston. There is only one A class road in the immediate area. All other roads are class B roads, minor roads and byways many being single track with passing places. However the construction works will require extensive earth movement by tracked plant and tipper type trucks plus deliveries brought in by heavy goods vehicles. The construction works may last for a significant period of time with considerable uncertainty over the sequencing of the schemes. The increased risk of accidents and congestion at the A12/A1094 junction and further along the A1094 towards Aldeburgh has not been adequately assessed. The construction traffic movements within the immediate vicinity of Friston, the use of access points and the proposed operational access road is unclear and confusing. There are significant errors and omissions in the Applicant's assessment and it fails to comply with Section 5.13 of EN-1.	The Applicants will respond in detail at Deadline 4. Since submission of the Applications, the Applicants have been progressing discussions with ESC and SCC on Traffic and Transport. The Applicants consider that the risk of accidents and congestion at the A12/A1094 junction and further along the A1094 towards Aldeburgh has been adequately assessed in ***Chapter 26 Traffic and Transport*** (APP-074). A further Traffic and Transport Note will be provided at Deadline 3. A series of clarification notes regarding Traffic and Transport have been or are being prepared. A ***Traffic and Transport: Deadline 1 Clarification Note*** (REP1-048) has been submitted to the Examination at Deadline 1.
13	Light Pollution Friston is an unsuitable location for the construction and operation of a large scale energy complex given the dark skies of the present rural	The Applicant will respond to the detailed Written Representation from SASES regarding light pollution at Deadline 3.

ID	Written Representation	Applicants' Comments
	environment and the proximity of residential dwellings. Light pollution will have impacts on the natural environment, human health and the aesthetic enjoyment of the night sky. Given the significant impacts from light pollution there should be greater detail in the outline code of construction practice in relation to the artificial light emissions management plan in particular there must be mandatory requirements in respect of minimising impacts to acceptable levels. In respect of construction impacts hours of working must be reduced to 08:00 to 16:00 with no working on weekends or bank holidays. In respect of operational impacts the artificial light emissions management plan should be approved as part of the design of the substation complex not prior to operation as currently proposed. Minimising artificial light emissions must be part of the design brief not an afterthought.	
14	<u>Safety</u> Sizewell A (currently in the course of decommissioning), Sizewell B and the proposed Sizewell C nuclear power stations are 6.5 km from Friston. The Applicant has taken no account of the impact of the schemes on the ability to carry out the current and future evacuation plans, not least given the demands this would place upon the road networks. The electrical infrastructure forming part of the schemes poses a significant fire and explosion risk. The Applicant envisages the use of gas insulated switchgear which relies on sulphur hexafluoride, a potent greenhouse gas. The use of this gas is being actively discouraged at international levels. There is no information in the environmental statement concerning the management of accidental leaks. There is no evidence that the Applicant has yet consulted the Health and Safety Executive as required by Section 4.11 of EN1 in respect of these matters.	The Applicants will respond in detail at Deadline 3. The Applicants note that SoCG with Office for Nuclear Regulation (ONR) (REP1-066), Sizewell C (REP1-061) has been prepared. There are no outstanding matters of disagreement relating to nuclear safety with ONR or Sizewell C with outstanding matters only on wording of the requirements of the DCO, which the Applicants are discussing with the Suffolk Joint Emergency Planning Unit. Regarding the use of fluorinated gases at the substations see the Applicants' response to ExA written question 1.0.22 (REP1-105) The Applicants remain in discussions with Sizewell B (REP1-076) regarding safety and the wording of the requirements of the DCO. The HSE was consulted as part of the scoping process (see APP-033) and at section 42 and provided responses at the time.

ID	Written Representation	Applicants' Comments
15	Tourism and Socio-Economics The Applicant has failed to carry out a robust assessment of the socio-economic impacts of these projects on the local economy of which the visitor economy is an important part. Further the Applicant has ignored the potential impact of the loss of "inward investment" which will result from East Suffolk ceasing to be an attractive place to own homes whether to escape urban life or retirement. The Applicant has also failed to address the independent report commissioned by the Suffolk destination management organisation which shows that there could be significant damage to the tourist economy as result of these projects and the development of Sizewell C. The onshore aspect of the schemes creates no permanent jobs to offset the damage to the local economy and the evidence to date shows there is are limited benefits in terms of offshore employment and skills enhancement.	The Applicants will respond in detail at Deadline 3. The Applicants undertook a proportionate assessment with regard to the impacts of the Projects. The Applicants have been in consultation with The Suffolk Coast Destination Management Organisation (DMO) since early 2018 (see Consultation Report, Table 4.7 (APP-029)). The Applicants would have included the findings of The Energy Coast report (as cited in the DMO's Relevant Representation (RR-082) within the EIA if it has been available within the timescales of the Projects' assessment. It was submitted just prior to the submission of the Applications in September 2019. It is the Applicants' view that the Report would have provided extra context on receptor sensitivity (taken as a generalised Suffolk coast visitor) but it would have not ultimately changed the conclusions of the impacts of the Projects. Given that the application for the Sizewell C New Nuclear Power Station has now been submitted, the Applicant prepared a ***Socio-Economics and Tourism Clarification Note (SZC CIA)*** which was submitted at Deadline 1 (REP1-036). This note relates to the CIA with regard to the potential impacts upon tourist accommodation during construction and cumulative impacts upon the labour market during construction when the Projects and SZC are considered together. ***Appendix 13, Tourism Impact Review***, of the Applicants' Responses to ExA WQ1 (REP1-102) further investigates the predicted impacts upon tourism during the construction phase of the Projects. Since submission of the Applications, the Applicants have been progressing discussions with ESC and SCC on Tourism and Socio-Economics.

ID	Written Representation	Applicants' Comments
16	Construction – Substation Site By having the ability to construct EA1N and EA2 consecutively rather concurrently with the possibility of further construction works in the future (see Written Representations concerning Cumulative Impact) the Applicant seems to be intent on maximising construction impacts rather than mitigating them. Given the terms of the DCOs serious disruption from construction could last for at least 10 years not taking account of pre-construction blight with which the community has already had to live for two years. The noise, vibration, light pollution, dust, air pollution, traffic, risk of flooding, loss of footpath and open space, will result in a substantial loss of amenity, disruption to people's lives and the community life of the village. Given the proximity to the village there needs to be much greater detail in the outline code of construction practice to ensure these matters will be properly addressed. The construction hours proposed are excessive and should be limited to 08:00 to 16:00, Monday to Friday with no weekend or bank holiday working.	The Applicants will respond in detail at Deadline 3. It should be noted, as outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants have committed to a reduction in the maximum footprint of each onshore substation to 190m x 170m. This represents an approximate 10% reduction in the development footprint of each onshore substation. In addition, the Applicants can now also confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information on both of these updates will be provided at Deadline 3. A programme for onshore works and an updated ***Outline CoCP*** will be submitted at Deadline 3.
17	Construction – Onshore Cable Corridor This summary principally but not entirely focuses on the impacts at the substation site at Friston but there are similar issues and impacts in respect of the onshore cable corridor. A summary of these are set out in pages 1 to 4 in the Written Representation concerning Construction - Onshore Cable Corridor.	The Applicants will respond in detail at Deadline 3. As outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include

ID	Written Representation	Applicants' Comments
		installing ducting using a trenchless technique at the landfall for both Projects at the same time.
18	Development Consent Order The draft DCOs have a significant number of major flaws as follows: a. there are serious omissions particularly in the Requirements b. the parameters of the schemes are either excessive or absent c. there is a lack of effective control over the Applicant and National Grid in key areas d. the consequences of two schemes in a single DCO where one of those schemes is also the subject of another DCO are not properly addressed e. there is no requirement to consult the local community in respect of matters which directly affect f. the use of arbitration as a dispute resolution mechanism is unsuitable given its confidential nature and its expense. Further detailed comments on the draft DCOs are provided in the Written Representation concerning the daft DCOs.	The Applicants will respond in detail at Deadline 3. Since submission of the Applications, the Applicants have been progressing discussions with numerous parties including ESC and SCC, Natural England, the Environment Agency on the ***draft DCO***. The Applicants are submitting an updated ***draft DCO*** (APP-023) at Deadline 3.

2.16 Suffolk County Council and East Suffolk Council

Deadline 1 Submissions from the Councils	Applicants' Response
East Suffolk Council and Suffolk County Council Joint Local Impact Report: East Anglia One North & East Anglia Two OFFSHORE WINDFARMS. Planning Inspectorate's References: EA1N – EN010077 & EA2 – EN010078	The Applicants understand that the joint Local Impact Report submitted by the Councils represents ESC's Written Representation to the Examinations. The Applicants have responded to the Councils' joint Local Impact Report within the ***Applicants' Comments on Local Impact Report*** submitted to the Examinations at Deadline 2 (document reference ExA.LIR.D2.V1). The Applicants anticipate that additional submissions to be made at Deadline 3 will provide information that further addresses some of the matters raised within the Councils' joint Local Impact Report.
Written Representations on behalf of Suffolk County Council in respect of the Draft DCO and Associated Documents	The Applicants note this submission from SCC and will submit an updated ***draft DCO*** (APP-023) and suite of updated outline plans to the Examinations at Deadline 3. It is anticipated that these will address many of the matters raised within SCC's Written Representation.
East Suffolk Council's and Suffolk County Council's Response to Examining Authority's First Round of Written Questions	Where appropriate, the Applicants have provided comments on the Councils' responses to the first round of the Examining Authority's written questions within the ***Applicants' Comments on Responses to Examining Authority's Written Questions*** submitted at Deadline 2 (document reference ExA.WQRs.D2.V1).
Potential site visit locations suggested by Suffolk County Council	No response.
Open Floor Hearing 2, Session 1, 14:00, 8 October: Councillor Richard Rout Speech	No response.
Location of Friston Infiltration Basin and Watercourses	The Applicants note that SCC (as the Lead Local Flood Authority) has a policy to keep watercourses open wherever possible and does not support the piping of the marked up watercourses running east-west at the onshore substation locations. The Applicants are preparing an Outline Operational Drainage Management Plan which will be submitted to the Examination at Deadline 3.

2.17 Suffolk Preservation Society

ID	Written Representation	Applicants Comments
Onshore		
001	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the impact of the industrialising effect on the historic landscape character and setting of heritage assets at Friston.	The Applicants note that extensive landscape planting is proposed within the ***Outline Landscape and Ecological Management Strategy*** (OLEMS) (APP-584) and the ***Outline Landscape Mitigation Plan*** (***Figure 29.11a*** (APP-401)) to mitigate the landscape and visual effects assessed within ***Chapter 29*** of the ES (APP-077). Within the draft Statement of Common Ground (SoCG) (REP1-060), SPS has deferred its position on mitigation to Suffolk County Council (SCC). The Applicants are continuing to engage with both East Suffolk Council (ESC) and SCC (the Councils) through the SoCG process on these matters (REP1-072). In particular, the Applicants and the Councils are in discussion on an adaptive maintenance and aftercare plan for the landscape planting. The Applicants will submit an updated ***OLEMS*** (APP-584) to the Examinations at Deadline 3.
002	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the flawed site selection process which selected the Friston area to host the onshore infrastructure.	The Applicants refer to their responses to Questions 1.0.1, 1.0.9, 1.0.16, 1.0.17 and 1.0.19 in ***Volume 2 Applicants' Responses to WQ1 1.0 Overarching, general and cross-topic questions*** (REP1-105) submitted at Deadline 1. It is the Applicants' position, in accordance with policies set out in National Policy Statement (NPS) EN-1 and based on extensive advice and stakeholder engagement, that the Grove Wood, Friston site offers the most appropriate option for the siting of onshore substations and National Grid infrastructure (section 4.9.1.7 of ***Chapter 4 Site Selection and Assessment of Alternatives*** (APP-052)). For site selection, the Applicants engaged in discussions regarding the onshore substation and National Grid substation locations via meetings,

ID	Written Representation	Applicants Comments
		site visits and workshops with a Site Selection Expert Topic Group (ETG) from July 2017. These meetings included the monthly project management Local Planning Authority meetings; and at the Suffolk Energy Projects Working Together meetings. The ETG comprised Suffolk County Council, Suffolk Coastal and Waveney District Council (now East Suffolk Council), Natural England, Historic England, the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), the Environment Agency and National Grid Electricity Transmission. The ETG met on the dates as outlined in ***Table 4.2*** of ***Chapter 4 Site Selection and Assessment of Alternatives*** (APP-052). The ETG consultation ensured that the site selection process accounted for a wide range of expert, independent advice and was robust. The process was not developed and undertaken solely by the Applicants. It was iterative, and topics, scoring and weighting were agreed through the ETG (see ***Appendix 4.2 - Red Amber Green (RAG) Assessment for Onshore Substations Site Selection in the Sizewell Area*** (APP-443)). It should be noted that Natural England provided the following comment on the site selection process (see ***Appendix 4.1 - Site Selection and Assessment of Alternatives Consultation Responses*** (APP-442)). *"As Natural England has been involved in the site selection process, we currently have no further comment on this chapter currently. However, we believe that SPR has adopted a good systematic approach that has allowed for a thorough consideration of alternative options."* Based on the above and considering the extensive work the Applicants have undertaken in relation to the site selection process, the Applicants do not consider the site selection process is flawed.
003	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the lack of consideration of the	Within the draft SoCG (REP1-060), SPS has deferred its position on mitigation measures for onshore archaeology to SCC. The Applicants

ID	Written Representation	Applicants Comments
	cumulative impacts of all current and proposed energy projects, including the impact of increased traffic including HGVs during the construction phase on the setting of heritage assets along the access routes. This should be fully assessed as part of this Examination.	consider that the assessment of cumulative impacts with other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17. As per ***paragraph 12*** of ***Appendix 24.7*** (APP-520), only changes in setting due to the operation of the Projects would be of sufficient duration to merit assessment. Given the temporary nature and short-term duration of the construction phase, all construction phase impacts to the setting of onshore heritage assets (including those arising from construction traffic) were scoped out of further assessment. The Applicants also refer to their response to item 1.0.18 with the ***Applicants' Responses to Examining Authority's Written Questions*** submitted to the Examinations at Deadline 1 (REP1-105).
004	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the Applicant's underestimation of the contribution made by setting to the significance of heritage assets.	The Applicants do not concur with SPS' claim that they have underestimated the contribution made by setting to the significance of heritage assets. The Applicants submitted an ***Archaeology and Cultural Heritage Clarification Note*** to the Examinations at Deadline 1 (REP1-021) which provides further consideration of historic landscape character in light of new information made available by the Councils following submission of the Applications and to address matters raised by stakeholders through the SoCG process. In order to produce an accurate assessment of the contribution of historical setting to significance, an independent contractor (Headland Archaeology) was commissioned by the Applicants. The resultant conclusions and narrative provided in ***section 24.6.2.1*** are based on and supported by this independent study (***Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes*** (APP-519)). The Applicants are therefore of the

ID	Written Representation	Applicants Comments
		view that an understanding of the historic landscape character has been adequately captured and potential impacts have been robustly assessed. Further archaeological assessment has been undertaken since submission of the Applications and was submitted to the Examinations at Deadline 1, including: • Pre- Construction Trial Trenching Report (REP1-024); • Onshore Archaeology: Geophysical Survey Report (REP1-025-033); and • Onshore Archaeology: Earthworks Report (REP1-034). The Applicants have committed to further pre-construction archaeological surveys (trial trenching) with SCC Archaeological Service which are anticipated to commence in 2021 (the scope of which is under discussion).
005	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the Applicant's reliance on a visual assessment, contrary to the Historic England Guidance, which advocates a broader set of criteria including; noise, dust, vibration, light pollution and impact upon the historic relationship between assets.	The Applicants do not agree that the assessment is overly reliant upon visual assessments. In the settings assessment (***Appendix 24.7*** (APP-519 and APP-520)) the Applicants have evaluated how the wider setting (from both a visual setting and historic / landscape character setting) contributes to the significance of the asset. Noise has been considered but is scoped out of further assessment within ***paragraph 14*** of ***Appendix 24.7*** (APP-519). It is considered that air quality (dust) impacts will occur during the construction-phase only. These have been scoped out of the assessment of the setting of heritage assets on basis these are temporary (***paragraph 12***, ***Appendix 24.7*** (APP-519). In line with their response to item 1.10.17 within the ***Applicants' Comments on Local Impact Report*** submitted to the Examinations at

ID	Written Representation	Applicants Comments
		Deadline 2 (document reference ExA.WQ-1.D1.V1_12), the Applicants note that measures to control construction lighting will be set out within an artificial light emissions management plan provided as part of the final Code of Construction Practice (CoCP). This is secured by Requirement 22 of the ***draft DCO*** (APP-023). Operation phase lighting must adhere to an operational artificial light emissions management plan, which will be prepared post-consent to discharge Requirement 25 of the ***draft DCO*** (APP-023). The final operational artificial light emissions management plan must be submitted to and approved by the relevant planning authority prior to the commencement of Work No. 30.
006	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the inadequate assessment of the impacts upon heritage assets during the construction and decommissioning phases.	Given the temporary nature of any potential construction and decommissioning impacts upon heritage assets, these phases of the Projects were scoped out of further assessment as explained in ***paragraph 12***, ***Appendix 24.7*** of the ES (APP-519). The Applicants note that this approach has been agreed by the Councils within statement LA-07.05 within the ***Draft SoCG: East Suffolk Council and Suffolk County Council*** submitted to the Examinations at Deadline 1 (REP1-072).
007	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the highly selective and, in some cases, misleading visualisations, resulting in an under representation of impacts.	The Applicants agreed the assets to be included in the assessment of onshore heritage asset setting with the Expert Topic Group (ETG) at the 23rd January 2019 meeting and identified appropriate viewpoints to inform the assessment. Viewpoints must include the asset being assessed and how the Projects interact with the setting of the asset. The Applicants consider the assessment of the setting of onshore heritage assets to be robust and appropriate. The photomontages produced for the assessment are considered to meet the appropriate standards and are suitable to inform judgements on the impacts of the onshore infrastructure, while recognising that all photomontages have limitations as set out in ***section 6.3.29.2*** in ***Appendix 29.2*** (APP-566).

ID	Written Representation	Applicants Comments
		It should be noted, as outlined in the ***Project Update Note*** submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information will be provided at Deadline 3.
008	The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to the scale and character of the proposals is incapable of mitigation and the Applicant's proposed landscape mitigation at 15 years is over optimistic.	Within the draft SoCG (document reference ExA.SoCG-17.D1.V1), SPS has deferred its position on landscape planting growth rates to Natural England and the Councils. The Applicants note matters relating to early planting, growth rates and the approach to landscape management remain under discussion with the Councils through the SoCG process. A draft SoCG with the Councils has been submitted to the Examinations at Deadline 1 (REP1-072). The Applicants note a trade off between potential landscape and visual impacts and potential cultural heritage impacts at the onshore substation locations through the mitigation planting associated with the implementation of a landscape management scheme. The Applicants consider that the planting proposals contained within the ***OLEMS*** (APP-584) and ***Outline Landscape Mitigation Plan*** (***Figure 29.11a*** (APP-401)) have had regard to the potential impacts upon both landscape and visual and cultural heritage receptors, and represents an appropriate balanced approach to the mitigation of impacts for each of these receptors. This matter remains under discussion with the Councils within the SoCG process (REP1-072).

ID	Written Representation	Applicants Comments
		The Applicants have submitted an ***Archaeology and Cultural Heritage Clarification Note*** to the Examinations at Deadline 1 (REP1-035) which provides further consideration of designated assets in light of new information received since submission of the Applications (namely the Rapid Historic Landscape Assessment, as presented within Appendix 1 to the Councils Joint Local Impact Report). This Clarification Note addresses matters in relation to cultural heritage raised during the SoCG process.
Offshore		
009	With regard to the impact of the offshore infrastructure on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, the proposals would introduce significant industrial development offshore that would be of an unprecedented scale as well as being animated and illuminated.	As per their response to Questions 1.16.8 in ***Volume 16 Applicants' Responses to WQ1 1.16 Seascape, landscape ad Visual Amenity*** (REP1-119) submitted at Deadline 1, the Applicants propose to include a new paragraph (2) within Requirement 31 of the updated ***draft DCO*** (APP-023) to be submitted at Deadline 3 stating *"Such lights will be operated at the lowest permissible lighting intensity level".* This amendment has been included to address stakeholder concerns surrounding the night-time visual effects of aviation lighting. The Applicants can commit to a reduction of nacelle lighting intensity from 2000cd to 200cd where the horizontal meteorological visibility in all directions from every turbine in the group is more than 5km. This embedded mitigation simply requires the installation of visibility meters at the site. The Applicants do this as a matter of course for their offshore windfarms (which benefit from this provision in ANO Article 223). The Applicants intend to secure this commitment through amendment to the ***draft DCO*** (APP-023) Schedule 1, Part 3, Requirement 31, which will be updated and submitted in the Examination at Deadline 3.

ID	Written Representation	Applicants Comments
010	With regard to the impact of the offshore infrastructure on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, significant negative impacts will result, and will cause significant harm to the special qualities of the AONB, most notably on seascape quality, scenic quality, relative wildness, relative tranquillity and cultural heritage qualities.	The Applicants note ongoing discussions with Natural England and the AONB Partnership regarding the seascape, landscape and visual amenity (SLVIA) effects to the Area of Outstanding Natural Beauty's special qualities. A SoCG specifically covering SLVIA matters with Natural England will be submitted to the Examinations at Deadline 3.
011	With regard to the impact of the offshore infrastructure on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, the intrusion into views of the seascape from within the AONB and the negative impact on long views along the coastline will be of such a magnitude that it will run counter to the purposes of the nationally designated AONB.	The Applicants have submitted its '***Effects with Regard to the Statutory Purposes of the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy'*** to the Examinations at Deadline 2 (document reference ExA.AS-5.D2.V1), which sets out and justifies the Applicants' position on the significance of effects upon the statutory purpose of the AONB.
012	With regard to the impact of the offshore infrastructure on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, the proposed mitigation to achieve a degree of separation between the two developments is inadequate and only a reduction in height of the turbines could materially reduce the visual impacts upon the setting of the AONB.	The Applicants note their commitment to reduce wind turbine tip height from 300m (as specified within the Applications) to 282m. The Applicants refer to statements LA-12.24 and LA-12.25 in the ***Draft SoCG: East Suffolk Council and Suffolk County Council*** submitted to the Examinations at Deadline 1 (REP1-072), which refer to both the reduced turbine tip heights and reduced East Anglia TWO windfarm site boundary. Both statements have been agreed by the Councils. The statements read as follows: *LA-12.24: Maximum turbine tip heights of 282m (revised down from 300m as proposed in the Applications) represents an appropriate commitment to reduce SLVIA effects identified within the ES.* *LA-12.25: A reduction in the East Anglia TWO windfarm site boundary from that presented in the Preliminary Environmental Information has reduced seascape, landscape and visual effects of the East Anglia TWO windfarm site on setting and key coastal viewpoints of the AONB, primarily due to the reduction in the lateral spread of the revised layout on the sea skyline, in key viewpoints from the AONB.*

2.18 The Wildlife Trusts

ID	Written Representation	Applicants Comment
001	**1. Impacts on the Southern North Sea SAC** **UXO Detonation and Piling** TWT highlights that careful planning/scheduling of underwater noise will be required if one project is undertaking UXO clearance whilst the other is undertaking piling activity. Further to the point, TWT agrees with Natural England's suggestion in their relevant representation [RR-059] that piling activities and UXO detonations should be limited to 1 on any given day, to ensure that 20% threshold of the Southern North Sea SAC is not exceeded. The Applicant should clarify their definition of a 24-hour period in each case, as this could affect adherence to the 20% threshold in the Southern North Sea SAC.	The Applicants also refer to point 11 within section 1.10 of the ***Applicant's Responses to Natural England's Deadline 1 submission*** (ExA.AS-10.D2.V1) regarding the limitation of UXO detonations to 1 on any given day. It is the Applicants view that the commitments secured in the conditions currently included in the DMLs prevent the introduction of high noise levels associated with UXO clearance which would breach the 20% threshold of the Southern North Sea SAC. This would be achieved through the approval process of the Site Integrity Plan (SIP) and Marine Mammal Mitigation Protocol (MMMP). This is explained further in ***Information to Support Appropriate Assessment – Addendum for Marine Mammals*** (REP1-038) submitted at Deadline 1. The control mechanism currently set out within the DMLs allows for the review of currently available mitigation techniques as well as consideration of new techniques that may become available during the pre-construction phase. It will also enable changes to the science on the issue, changes in guidance and regulatory advice and any changes to the conservation objectives for the SAC to be taken into consideration prior to approval of the SIP and MMMP by the MMO. Additionally, the Applicants have committed to consulting with Natural England (and The Wildlife Trust) through the in-principle SIP and have proposed a consultation programme within the in-principle SIP that commences more than 12 months in advance of the first noisy activity (UXO clearance). It is the Applicants' view that the commitments already made allow for robust control of this issue by the MMO and that no further conditions are necessary.

ID	Written Representation	Applicants Comment
002	**Mitigation** **Proposed SNCB advice on underwater noise management** TWT recognises that significant progress has taken place over the past year in underwater noise management in the Southern North Sea, however we do not agree with the proposed SNCB advice[3]. The current approach is based upon the carrying capacity of the Southern North Sea SAC. We have no understanding as to what the carrying capacity of harbour porpoise is in the Southern North Sea SAC. The science underpinning the advice is weak and we believe the proposed approach will be difficult to deliver. Defra and the Southern North Sea Regulators Working Group are taking positive steps to develop effective management for in-combination underwater noise impacts and TWT will continue to work closely with all stakeholders on this. However, as regulatory management mechanisms are currently not in place. We appreciate that the development of the regulatory mechanism is outside the control of this examination, however we suggest the Planning Inspectorate and the Secretary of State considers what controls need to be put in place to ensure no adverse effect on the Southern North Sea SAC at this current time. TWT are currently advocating the underwater management approach used in Germany[4]. The approach sets noise limits at which piling activity must not exceed. These noise limits are based upon scientific evidence. Germany has stricter noise protection outside their SACs to what is being	The Applicants note this comment relates to advice provided by Natural England as the Statutory Nature Conservation Body. It also relates to the responsibility of the MMO as a regulator to develop a mechanism to manage the SIP process in respect of the Southern North Sea SAC. The Applicants therefore have no further comment on this matter.

[3] Guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs (England, Wales & Northern Ireland). June 2020. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/889842/SACNoiseGuidanceJune2020.pdf

[4] German Sound Protection Concept http://www.ascobans.org/sites/default/files/document/AC21_Inf_3.2.2.a_German_Sound_Protection_Concept.pdf

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	proposed within UK harbour porpoise SACs. Noise limits are also used in the Netherlands and Belgium. TWT has expressed this opinion widely with industry, SNCBs, regulators and government.	
003	**Assessment results** As a result of our concerns highlighted above, we cannot agree with the in-combination assessment conclusions of no adverse effect on the Southern North Sea SAC. We are pleased the applicant has included TWT as a consultee on the Draft (MMMP) and In-Principle Site Integrity Plan (SIP) and we welcome the opportunity to discuss mitigation further with the applicant. TWT would like to see more detail on the potential effectiveness of the mitigation measures mentioned on the In-principle SIP. This should include referenced examples of how the implementation of mitigation will reduce underwater noise disturbance impacts within the Southern North Sea SAC. TWT will reassess our satisfaction when we see the updated Draft MMMP and the In-principle SIP at Deadline 3. The following text of the European Commission Article 6 Habitats Directive Guidance from 21st November 2018[5] (page 52) establishes the obligation to detail the effectiveness of mitigation measures. ""*For the competent authority to be able to decide if the mitigation measures are sufficient to remove any potential adverse effects of the plan or project on the site (and do not inadvertently cause other adverse effects on the species and habitat types in question), each mitigation measure must be described in detail, with an explanation based on scientific*	The Applicants have committed to preparing a robust MMMP and SIP in accordance with the ***Draft MMMP*** (APP-591) and ***In-principle SIP*** (APP-594) which will be approved by the MMO and in respect of which the Applicants have committed to consulting with TWT. Additionally, the ***draft DCO*** (APP-023) includes provisions for pre-construction and post-construction monitoring of marine mammals (see Agreement Statements TWT-017 and 018 of the Draft Statement of Common Ground with The Wildlife Trust (REP1-071) submitted at Deadline 1). As described in ***section 2.1*** of the ***In-principle SIP***, the Applicants acknowledge that any required mitigation or management measures should be precise, effective and deliverable in order to maintain the integrity of the Southern North Sea SAC for harbour porpoise. The SIP is designed to ensure that this will be the case once any required measures have been defined. ***Table 2.1*** of the ***In-principle SIP*** provides an outline of the proposed schedule for refinement and sign-off for the SIP. The Applicants will be in a position at final design to provide refined project details relevant to the piling and UXO SIP. In addition, accompanying environmental information, including consideration of the efficacy of mitigation or management measures will be provided.

[5] Commission notice "Managing Natura 2000 sites The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/Provisions_Art_.nov_2018_endocx.pdf

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	evidence of how it will eliminate or reduce the adverse impacts which have been identified."	
004	**2. Marine Mammal Monitoring** **Strategic Level Monitoring** TWT advocates for a strategic approach to marine mammal monitoring, particularly of the Southern North Sea SAC where monitoring of both harbour porpoise and underwater noise pre construction, construction and post construction of both noise levels and harbour porpoise activity is necessary to understand the impact of underwater noise on harbour porpoise as an EPS and on the Southern North Sea SAC. There is a great deal of uncertainty regarding the impacts of underwater noise on harbour porpoise in UK waters; very few studies have been undertaken. TWT are concerned that if a strategic approach is not agreed, then monitoring across all projects will not be adequate. Under the current provisions for monitoring, no information will be recorded on the noise levels per day or during the course of the construction programme, which is essential for understanding the impacts of underwater noise on harbour porpoise as an EPS and the Southern North Sea SAC. Without effective monitoring we cannot determine the effectiveness of mitigation. To provide more confidence, TWT recommends that all offshore wind farm developments should contribute funding and participate in the delivery of strategic monitoring. Developers all agree that a strategic approach to	The Applicants refer to their position for Agreement Statement TWT-018 of the ***Draft Statement of Common Ground with The Wildlife Trust*** (REP1-071) submitted at Deadline 1 regarding marine mammal monitoring. The ***draft DCO*** (APP-023) secures marine mammal monitoring which will be addressed post-consent through the Monitoring Plan. The basis of any marine mammal monitoring required for inclusion in the Monitoring Plan will be identified through the MMMP and SIP in respect of which the Applicants have agreed to consult with TWT. The Applicants are a subsidiary of ScottishPower Renewables (UK) Limited (SPR) and SPR has a strong track record of engagement on strategic monitoring projects for marine mammals including: • Providing technical input and funding to develop the DEPONS[6] • Commissioning the collection and managing the ongoing assessment of project level piling data on East Anglia ONE with the intent that this could be used to advance understanding of the effectiveness and limitations of the DEPONS and iPCOD population effect models; • The intent to provide underwater noise data collected during UXO detonation at East Anglia ONE to support ongoing BEIS work contracted to Hartley Anderson to understand the noise

[6] The Disturbance Effects of Noise on the Harbour Porpoise Population in the North Sea (DEPONS) model was developed to simulate individual animal's movements, energetics and survival for assessing population consequences of sub-lethal behavioural effects. Also see Nabe-Nielsen, J., van Beest, F.M., Grimm, V., Sibly, R.M., Teilmann, J. and Thompson, P.M. (2018). Predicting the impacts of anthropogenic disturbances on marine populations. Conserv Lett. 2018;e12563. https://doi.org/10.1111/conl.12563.

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	monitoring is the most effective approach but consistently highlight that a mechanism for delivery is lacking.	profiles of underwater explosions which would be used to produce new industry guidance; and • Participation in the Joint Cetacean Protocol and commitment to data sharing. The Applicants do not consider that strategic monitoring is appropriate at a project level in the context of the Applications.
005	**Monitoring Certainty** As part of the Statement of Common Ground, TWT have asked for the inclusion of the Final Investment Decision (FID) and Contract for Difference (CfD) across all SIPs prepared by the offshore wind industry. This is to ensure no adverse effect. Monitoring requirements also need to be taken into account in relation to these milestones. The inclusion of FID and CfD milestones in the In-principle SIP is currently under consideration by the applicant.	The inclusion of reference to FID and CfD milestones in the in-principle SIP will be addressed in the updated in-principle SIP to be submitted into the Examination at Deadline 3 (TWT-015 of the ***Draft Statement of Common Ground with The Wildlife Trust*** (ExA.SoCG-28.D1.V1) submitted at Deadline 1).
006	**3. The inclusion of fishing in in-combination assessments** TWT is aware that that applicant has agreed with Natural England at an Expert Topic Group (ETG) Meeting on the 6th of March 2018, that fishing activity will be considered as part of the baseline. However, as TWT have stated across all offshore windfarm consultations as a principle, we believe fishing should be included in all in-combination assessment. Fishing is a licensable ongoing activity that has the potential to have an adverse impact on the marine environment. This is supported in the leading case C-127/02 ***Waddenzee*** [2004] ECR I-7405, the CJEU held at para. 6 "*The act that the activity has been carried on periodically for several years on the site concerned and that a licence has to be obtained for it every year, each new issuance of which requires an assessment both of the possibility of carrying on that activity and the site where it may be carried*	The Applicants refer to their position for Agreement Statement TWT-005 of the ***Draft Statement of Common Ground with The Wildlife Trust*** (REP1-071) submitted at Deadline 1. As agreed with Natural England at an Expert Topic Group (ETG) Meeting on the 6th of March 2018, fishing activity has been considered as part of the baseline. The Applicants consider this is appropriate as it has existed in the North Sea for a long time before any offshore windfarm construction and it is not a recent or an increasing activity (in most areas fishing is currently in decline). This position is supported in the approach taken by the Secretary of State in relation to the Appropriate Assessments for both the Hornsea Project Three and Norfolk Vanguard offshore windfarms.

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	on, does not itself constitute an obstacle to considering it, at the time of each application, as a distinct plan or project within the meaning of the Habitats Directive". This caselaw demonstrates that fishing is considered a plan or a project and therefore not part of the baseline. Fishing should be included in all in-combination assessments where there is an interaction with a designated feature. In-combination impacts must be taken into account in the same way as if they were removed and the total impact of all human activities considered. Current Defra policy[7] is to ensure that all existing and potential fishing operations are managed in line with Article 6 of the Habitats Directive. The current, risk-based, 'revised approach' to fisheries management in European Marine Sites is a compromise agreed by all to prevent the closure of fisheries during assessment. This approach further supports that fishing is considered a plan or a project and therefore must be included in the in-combination assessment in line with Article 6(3) of the Habitats Directive Following the commencement of judicial review proceedings by TWT against Dogger Bank Offshore Wind farms, TWT was given assurances that fishing would be included in future offshore wind farm assessments. We have raised this issue with the Planning Inspectorate over several planning applications (Hornsea 3, Norfolk Vanguard, Norfolk Boreas) and have also raised the issue with Defra and BEIS. We make this case for all MPAs assessed in this application.	

[7] Defra Policy to ensure that all existing and potential commercial fishing operations are managed in line with Article 6 of the Habitats Directive https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/345970/REVISED_APPROACH_Policy_and_Delivery.pdf

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007	**Post-consent engagement with the applicant** We are pleased that the applicant has included TWT as a consultee on the Draft MMMP and the In-principle SIP in response to comments made in our Relevant Representation. We welcome this opportunity to formally engage with the applicant on the development of the plan post-consent and to discuss the implementation of mitigation and monitoring further.	No further comment.