

**SCOTTISHPOWER  
RENEWABLES**

# **East Anglia ONE North and East Anglia TWO Offshore Windfarms**

## **Applicants' Comments on Written Representations** Volume 3: Individual Stakeholders

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



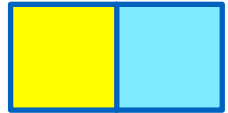
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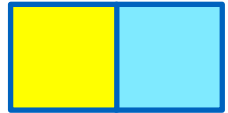
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This document is supported by the following appendices:

Appendix number	Title
1	Letter concerning the BEIS Review to The Rt. Hon. Dr Kwasi Kwarteng 3 Aug 2020
2	Reply from Rt. Hon. Kwasi Kwarteng MP, Minister of State for Business, Energy and Clean Growth, 1st September 2020 to SEAS and SASES
3	2nd Letter concerning the BEIS Review to The Rt. Hon. Dr Kwasi Kwarteng, 7 September 2020
4	2nd Reply from Rt. Hon. Kwasi Kwarteng MP, Minister of State for Business, Energy and Clean Growth, 18th September 2020 to SEAS and SASES



## Glossary of Acronyms

AEol	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 Heritage
CIA	Cumulative Impact Assessment
CJEU	Court of Justice of the European 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 Management 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 Safety 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 Astronomical 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 Decommissioning Authority
NE	Natural 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
REPIIR	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 Cruelty to Animals
RTD	Red Throated Diver
SASES	Substation Action Save East Suffolk
SAC	Special Area of Conservation
SBP	Sub-Bottom Profiler
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.

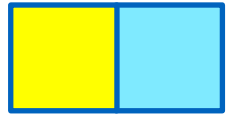




Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Meteorological mast	An offshore structure which contains 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 <i>in situ</i> 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 received from Interested Parties (IPs) for the East Anglia ONE North and East Anglia TWO offshore windfarms ('the Projects') have been separated into Volumes, as discussed in **Volume 1** (document reference ExA.WR\_1.D2.V1).
2. This Volume presents the Applicants' comments on Written Representations received from members of the public / businesses. Written Representations received in respect of the Projects from members of the public / businesses have been grouped by topic in order to avoid unnecessary repetition in responses. The key topics raised in these Written Representations along with the Applicants' comments have been provided in **Table 1** to **Table 26** below.
3. 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 23<sup>rd</sup> 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.
4. It should be noted that some members of the public / businesses only submitted Written Representations for one project, however, to ensure all Written Representations were considered by the Applicants these representations have been considered with regard to both Projects.



## 2 Topic by Topic Comments on Members of the Public / Businesses Written Representations

5. Each member of the public / business that has made a Written Representation in relation to a particular topic is identified within the tables below using the reference number assigned to that Written Representation by the Planning Inspectorate. The tables also summarise agreements and progress made since submission of the Applications on the topics raised. The Applicants believe that it is important to highlight that matters raised by stakeholder concerns are recognised and taken seriously by the Applicants, and that since submission of the Applications the Applicants have been working with statutory consultees (such as the Councils, the Environment Agency etc) on such topics to clarify matters raised with the assessment or to provide more detail on, for example, mitigation proposals.
6. 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.
7. As also 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.



## 2.1 Adequacy of Consultation

**Table 1 Applicants' Comments on Adequacy of Consultation**

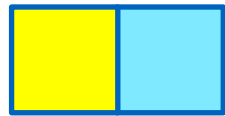
No.	Written Representation Number	Applicants' Comments
01	REP1-199, REP1-202, REP1-245, REP1-246, REP1-247, REP1-140, REP1-248, REP1-252, REP1-266, REP1-267, REP1-279, REP1-282, REP1-284, REP1-294, REP1-295, REP1-297, REP1-301, REP1-302, REP1-303, REP1-306, REP1-307, REP1-336, REP1-338, REP1-328, REP1-329, REP1-181, REP1-374, REP1-382, REP1-383, REP1-290, REP1-239, REP1-238, REP1-233, REP1-228, REP1-130, REP1-223, REP1-217, REP1-216, REP1-214, REP1-206	<p>The Applicants note Written Representations regarding the consultation undertaken by National Grid and their involvement in Examination.</p> <p>National Grid infrastructure forms part of the Development Consent Order (DCO) application (<b>Chapter 6 Project Description</b> (APP-054)), submitted by the Applicants. The Applicants have engaged in consultation on behalf of National Grid. <b>Section 3.1 of the Submission for Oral Case: Preliminary meeting (Part 1)</b> (PDC-001) provides further information on the inclusion of National Grid infrastructure within the DCO Applications.</p> <p>The Applicants have also engaged with National Grid since the Projects' inception. Outcomes of this engagement and Project developments have been subsequently communicated to stakeholders as described in the <b>Consultation Report</b> (APP-029). The Applicants have also progressed Statements of Common Ground (SoCG) with National Grid Electricity Transmission (REP1-064), and National Grid Electricity System Operator (REP1-063), drafts of which have been submitted at Deadline 1. SoCG discussions will be progressed throughout Examination.</p>



## 2.2 Air Quality

**Table 2 Applicants' Comments on Air Quality**

No.	Written Representation Number	Applicants' Comments
02	REP1-245, REP1-246, REP1-138, REP1-250, REP1-270, REP1-287, REP1-288, REP1-295, REP1-302, REP1-304, REP1-307, REP1-320, REP1-322, REP1-181, REP1-192, REP1-373, REP1-198, REP1-383, REP1-387, REP1-289, REP1-393, REP1-241, REP1-240, REP1-238, REP1-237, REP1-228, REP1-130, REP1-216, REP1-211, REP1-129, REP1-210	<p>Written Representations have been received regarding air quality, particularly impacts during construction and operation and cumulatively with the proposed Sizewell C New Nuclear Power Station (SZC).</p> <p>The Applicants have held SoCG meetings regarding air quality with the Councils, and submitted a draft SoCG (REP1-072) at Deadline 1</p> <p>The Applicants have submitted an <b>Air Quality Clarification Note</b> to Examination at Deadline 1 (REP1-040). This clarification note provided detailed information regarding a number of points which were discussed with the Councils during SoCG meetings, including:</p> <ul style="list-style-type: none"> <li>• Consideration of the latest Institute of Air Quality Management (IAQM) ecological guidance document;</li> <li>• Impacts to ecological receptors arising from airborne Nitrogen Oxide (NOx) concentrations and acid deposition;</li> <li>• Impacts to ecological receptors as a result of Non-Road Mobile Machinery (NRMM) emissions;</li> <li>• Clarification of discrepancies between the worst-case traffic forecasts used in the air quality and <b>Chapter 26 Traffic and Transport</b> (APP-074);</li> <li>• Assessment of haul road traffic emissions; and</li> <li>• Assessment of impacts associated with diverted traffic.</li> </ul> <p>The Applicants will provide further clarification on the assessment of ecological impacts arising from Non-Road Mobile Machinery (NRMM), as well as NOx and nutrient nitrogen deposition arising from haul road construction vehicle movements. This information will be provided at Deadline 3.</p>



No.	Written Representation Number	Applicants' Comments
		<p>In addition, the Applicants have submitted a response to A1094 Air Quality Evidence submitted by Georgina King at deadline 1 (document reference ExA.AS-2.D2.V1). This response provides information regarding the air quality assessment undertaken and the consideration of ozone.</p> <p>Regarding cumulative impacts with SZC on air quality, as detailed in the <b>Applicants Procedural Decision 18 Response</b> (PDC-001) although the SZC conclusions do not change the Projects' CIA conclusions at application, the Applicants note that there is now relevant information now with regards to transport and traffic. Given that this matter is related to traffic and transport, clarification regarding air quality has been provided in the <b>Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)</b> which has been submitted at this deadline (document reference ExA.AS-6.D2.V1).</p>



## 2.3 Cultural Heritage

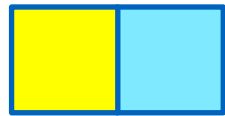
**Table 3 Applicants' Comments on Cultural Heritage**

No.	Written Representation Number	Applicants' Comments
03	REP1-201, REP1-245, REP1-246, REP1-140, REP1-250, REP1-261, REP1-259, REP1-267, REP1-279, REP1-280, REP1-282, REP1-284, REP1-288, REP1-289, REP1-290, REP1-302, REP1-307, REP1-310, REP1-313, REP1-314, REP1-322, REP1-336, REP1-338, REP1-198, REP1-383, REP1-387, REP1-243, REP1-238, REP1-236, REP1-232, REP1-226, REP1-220, REP1-211, REP1-128, REP1-207, REP1-208, REP1-209	<p>Written Representations received regarding cultural heritage relate to archaeological assessments, impacts to heritage setting, impact to the historic parish boundary and impact to listed buildings (designated heritage assets).</p> <p>The Applicants have held SoCG discussions regarding cultural heritage with the Councils, Historic England, Suffolk Presentation Society (SPS) and submitted draft SoCGs with the Councils (REP1-072) and SPS (REP1-060) at Deadline 1.</p> <p>The Applicants provided responses to written questions from the Examining Authority at Deadline 1, specific responses regarding cultural heritage can be found in <b><i>Applicants' Responses to Examining Authority's Written Questions Volume 10 – 1.8 Historic Environment</i></b> (REP1-113)</p> <p>In addition, the Applicants submitted an <b><i>Archaeology and Cultural Heritage Clarification Note</i></b> (REP1-021) at Deadline 1 in response to SoCG discussions with the Councils. The note relates to archaeology and cultural heritage matters and brings together information presented across several documents submitted as part of the Applications in October 2019, as requested by the Councils during the SoCG process.</p> <p><u>Archaeological Assessments</u></p> <p>Further archaeological assessment has been undertaken since the DCO application and reporting on these assessments was submitted at Deadline 1 including:</p> <ul style="list-style-type: none"> <li>• Pre- Construction Trial Trenching Report (REP1-024);</li> <li>• Onshore Archaeology: Geophysical Survey Report (REP1-025 to REP1-033); and</li> <li>• Onshore Archaeology: Earthworks Report (REP1-034)</li> </ul>

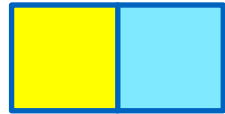




No.	Written Representation Number	Applicants' Comments
		<p>The Applicants have committed to further pre-construction archaeological surveys (trial trenching) with Suffolk County Council (SCC) Archaeological Service which are anticipated to commence in 2021 (the scope of which is under discussion).</p> <p><u>Heritage Setting</u></p> <p>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 <b>section 24.6.2.1</b> are based on and supported by this independent study (<b>Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes</b> (APP-519)). The Applicants are therefore of the view that an understanding of the historic landscape character has been adequately captured and potential impacts have been robustly assessed.</p> <p><u>Historic Parish Boundary</u></p> <p>The Applicants acknowledge that the onshore substation and National Grid substation are proposed to be located on part of the historic parish boundary of Friston. The Applicants have assessed the cultural heritage impact to the historic parish boundary in two ways, both as a physical asset and within the assessment of Historical Landscape Character; and also assessed the physical loss of the Public Right of Way (PRoW) associated with the historic parish boundary.</p> <p>The Applicants have given further consideration to the parish / Hundred boundary within the <b>Archaeology and Cultural Heritage Clarification Note</b> (REP1-021) submitted into the Examination at Deadline 1. Requirement 19 and Requirement 20 of the <b>draft DCO</b> (APP-023) will together ensure that the appropriate programme of archaeological investigation and mitigation is undertaken at the appropriate time prior to commencement of construction.</p> <p>As outlined in the <b>Notice of Intent to make Non-Material or Material Changes</b> (REP1-039), the expansion to the Order Limits at High House Farm to facilitate the permanent diversion of PRoW E-363/027/0 will re-introduce the historic footpath and historic field boundary in the north western area of the Order Limits, as presented within the 1st edition historic OS map of 1883/84 (Figure 1</p>



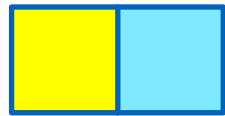
No.	Written Representation Number	Applicants' Comments
		<p>of the <b>Outline Landscape and Ecological Management Strategy</b> (APP-584)) and has been discussed with Historic England and the Councils.</p> <p><u>Impacts to Listed Buildings</u></p> <p>Mitigation of physical effects on historic features and landscape character is provided in the <b>Outline Landscape Management Plan</b> (OLMP) (APP-401 – APP-403) proposals as part of the submitted <b>Outline Landscape and Environmental Management Strategy</b> (OLEMS) (APP-584). The <b>OLMP</b> (APP-401- APP-403) proposals recognise the importance of historic field boundaries and propose mitigation for re-instatement of historic field boundaries, tree lined avenues and woodland blocks to provide notable screening, through the re-introduction of historic landscape features that had been lost over time.</p> <p>Details of management measures will be set out within the Landscape Management Plan secured under Requirement 14 of the <b>draft DCO</b> (APP-023) which will accord with the <b>OLEMS</b> (APP-584).</p> <p>It should be noted, as outlined in the <b>Project Update Note</b> 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. These reductions allow for further refinement of mitigation plans. Further details including a selection of revised photomontages and an updated <b>OLEMS</b> and <b>OLMP</b> will be submitted at Deadline 3 reflecting these changes.</p>



## 2.4 Cumulative Impacts of All Projects

**Table 4 Applicants' Comments on Cumulative Impacts of All Projects**

No.	Written Representation Number	Applicants' Comments
05	REP1-199, REP1-201, REP1-202, REP1-246, REP1-141, REP1-250, REP1-252, REP1-253, REP1-258, REP1-261, REP1-263, REP1-266, REP1-267, REP1-280, REP1-283, REP1-294, REP1-297, REP1-298, REP1-301, REP1-302, REP1-303, REP1-307, REP1-310, REP1-315, REP1-318, REP1-322, REP1-336, REP1-338, REP1-328, REP1-329, REP1-181, REP1-192, REP1-373, REP1-375, REP1-194, REP1-198, REP1-381, REP1-383, REP1-384, REP1-385, REP1-386, REP1-290, REP1-391, REP1-393, REP1-242, REP1-240, REP1-239, REP1-238, REP1-237, REP1-236, REP1-235, REP1-234, REP1-233, REP1-232, REP1-228, REP1-227, REP1-226, REP1-130, REP1-222, REP1-221, REP1-220, REP1-219, REP1-218, REP1-216, REP1-215, REP1-211, REP1-129, REP1-210, REP1-207, REP1-208, REP1-209, REP1-205	<p>Written Representations raised a number of queries regarding cumulative impacts with other projects and cumulative impacts with SZC.</p> <p><u>Cumulative Impact Assessment (CIA) with Other Projects</u></p> <p>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 base any meaningful assessment (with no information on, for example, the project design, and timescales):</p> <ul style="list-style-type: none"> <li>• Nautilus;</li> <li>• EuroLink;</li> <li>• Greater Gabbard Offshore Windfarm Extension; and</li> <li>• Galloper Offshore Windfarm Extension.</li> </ul> <p>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.</p> <p>Each of the proposed projects will require its own EIA and as part of its consents 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.</p>



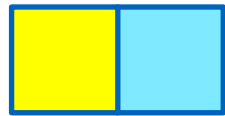
No.	Written Representation Number	Applicants' Comments
		<p><u>Sizewell C</u></p> <p>New information on the construction of SZC is considered in the cumulative impact assessment clarification notes which have been submitted at Deadline 1 and Deadline 2. These notes cover the following topics:</p> <ul style="list-style-type: none"> <li>• Traffic and Transport (submitted at Deadline 2, document reference ExA.AS-6.D2.V1)                             <ul style="list-style-type: none"> <li>• including a supplementary cumulative traffic assessment taking into account SZC; and</li> <li>• updates in respect of: Noise and Vibration (including health and wellbeing); and Air Quality.</li> </ul> </li> <li>• LVIA (submitted at Deadline 2, document reference ExA.AS-7.D2.V1)                             <ul style="list-style-type: none"> <li>• including relevant updates in respect of Amenity and Recreation.</li> </ul> </li> <li>• Socio-Economics and Tourism (submitted at Deadline 1 (REP1-036))</li> </ul>



## 2.5 Environmental Impact Assessment Methodology

**Table 5 Applicants' Comments on Environmental Impact Assessment Methodology**

No.	Written Representation Number	Applicants' Comments
001	REP1-245, REP1-246, REP1-267, REP1-294, REP1-298, REP1-302, REP1-310, REP1-312, REP1-315, REP1-181, REP1-182, REP1-192, REP1-377, REP1-194, REP1-383, REP1-393, REP1-228, REP1-130, REP1-223, REP1-218, REP1-206	<p>Written Representations were received regarding the approach to the Environmental Impact Assessment (EIA) and the Project Design Envelope.</p> <p>The Applicants have no further comments regarding the approach to the EIA beyond that set out in <b>Table 7</b> of the <b>Applicants' Comments on Relevant Representations Volume 2: Individual Stakeholders</b> (AS-035)</p> <p>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 <b>draft DCO</b> (APP-023).</p> <p>The Applicants have submitted an <b>Outline National Grid Substation Design Principles Statement</b> to Examination at Deadline 1 (REP1-046), and the Applicants will amend the <b>draft DCO</b> (APP-023) at Deadline 3 to require the final details of the layout, scale and external appearance of the National Grid substation to be in accordance with the Outline National Grid Substation Design Principles Statement.</p> <p>As detailed within the <b>draft Statement of Common Ground with National Grid Electricity Transmission plc</b>: (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)".</p>



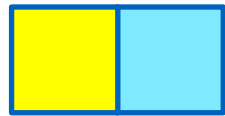
No.	Written Representation Number	Applicants' Comments
		<p>An update to the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) and <b>Outline Onshore National Grid Substation Design Principles Statement</b> will be submitted at Deadline 3 to provide further details of the proposed design process. It is the Applicants' intention to progress the detailed design with the Councils in the first instance from early 2021.</p> <p>It should be noted, as outlined in the <b>Project Update Note</b> 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.</p>



## 2.6 General Offshore Comments

**Table 6 Applicants' Comments on General Offshore Comments**

No.	Written Representation Number	Applicants' Comments
06	REP1-182, REP1-192, REP1-220	<p>A small number of Written Representations raised concerns regard impacts from the offshore infrastructure on the marine environment.</p> <p>The Applicants have engaged with many stakeholders regarding offshore topics during the SoCG process. The list of stakeholders and offshore topics which have been discussed can be found in the <b>Statement of Commonality</b> (REP1-052)</p> <p>As presented in the <b>Notice of Intent to make any Material or Non Material Changes</b> (REP1-039) to reduce the potential impact from collision risk with birds, the draught height of wind turbines will be increased from 22m above mean high water springs (MHWS) to 24m above MHWS. This will be included in the updated <b>draft DCO</b> (APP-023) submitted at Deadline 3.</p> <p>The Applicants have also reduced the maximum tip height of wind turbines from 300m Lowest Astronomical Tide (LAT) to 282m LAT as presented in the <b>Notice of Intent to make any Material or Non Material Changes</b> (REP1-039). This amendment will be included in the updated draft DCO to be submitted at Deadline 3.</p> <p>Further updates with regards to offshore receptors include:</p> <ul style="list-style-type: none"> <li>• An <b>Outline Sabellaria Reef Management Plan</b> has been produced and submitted at Deadline 1 (REP1-044) to provide further detail on potential mitigation and management of potential impacts on <i>sabellaria</i> reef.</li> <li>• To minimise impact of noise on marine mammals the Applicants have committed to only one detonation at a time during Unexploded Ordnance (UXO) clearance operations in the offshore development areas. There would be no simultaneous UXO detonations. In the summer period in the summer area potentially more than one UXO detonation could occur in a 24 hour period. In the winter period in the winter area, only one UXO detonation without</li> </ul>



No.	Written Representation Number	Applicants' Comments
		<p>mitigation could occur in a 24 hour period. This will be captured in an updated <b>Draft Marine Mammal Mitigation Plan (MMMP)</b> and <b>In-principle Site Integrity Plan (SIP)</b> to be submitted at Deadline 3</p> <ul style="list-style-type: none"> <li>• To minimise impact of noise on marine mammals there would be no concurrent piling within the offshore development area, with only one pile being installed at a time, with no overlap in the piling duration of any two piles. In the summer period in the summer area potentially more than one piling event could occur in a 24 hour period. In the winter period in the winter area, only one piling event without mitigation could occur in a 24 hour period. This will be captured in an updated <b>Draft MMMP</b> and <b>In-principle Site Integrity Plan SIP</b> to be submitted at Deadline 3.</li> <li>• During the winter period there would be no UXO detonation without mitigation in the offshore development area in the same 24 hour period as any piling without mitigation in the offshore development area. This will be captured in an updated <b>Draft (MMMP</b> and <b>In-principle SIP</b> to be submitted at Deadline 3.</li> <li>• The Applicants will submit a Fisheries Liaison and Coexistence Plan (FLCP) to the Marine Management Organisation (MMO) for approval prior to commencement. This will be in accordance with the <b>outline FLCP</b> which was submitted at Deadline 1 (REP1-045). Reference to the FLCP being in accordance with the outline FLCP will be included in the updated draft DCO to be submitted at Deadline 3.</li> </ul>

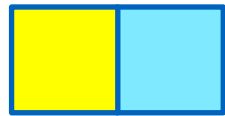




## 2.7 Grid Connection Point

**Table 7 Applicants' Comments on Grid Connection Point**

No.	Written Representation Number	Applicants' Comments
07	REP1-201, REP1-295, REP1-296, REP1-297, REP1-298, REP1-314, REP1-315, REP1-320, REP1-376, REP1-384, REP1-386, REP1-290, REP1-239, REP1-238, REP1-234, REP1-227, REP1-226, REP1-223, REP1-218, REP1-211	<p>Written Representations raised questions regarding the grid connection location for the Projects.</p> <p>The Applicants provided comments regarding various aspects of the grid connection point in response to the ExA Written Questions, particularly WQ1.0.1, 1.0.2, and 1.0.17 in <b>Applicants' Response to ExA WQ1 Volume 2 1.0 Overarching, general and cross-topic questions</b> (REP1-105).</p> <p>The Applicants have no further comments regarding the grid connection point beyond that set out in <b>Table 9</b> of the <b>Applicants' Comments on Relevant Representations Volume 2: Individual Stakeholders</b> (AS-035)</p>



## 2.8 Human Health

**Table 8 Applicants' Comments on Human Health**

No.	Written Representation Number	Applicants' Comments
08	REP1-202, REP1-245, REP1-246, REP1-255, REP1-257, REP1-260, REP1-267, REP1-268, REP1-275, REP1-279, REP1-280, REP1-284, REP1-295, REP1-296, REP1-298, REP1-300, REP1-301, REP1-302, REP1-307, REP1-309, REP1-314, REP1-320, REP1-331, REP1-322, REP1-336, REP1-182, REP1-373, REP1-374, REP1-377, REP1-382, REP1-385, REP1-386, REP1-289, REP1-290, REP1-393, REP1-243, REP1-241, REP1-240, REP1-237, REP1-231, REP1-228, REP1-221, REP1-217, REP1-129, REP1-128, REP1-210, REP1-203	<p>Written Representations have been received regarding potential impacts to human health as a result of the Projects including mental health and the Applicants recognise that the Projects will evoke responses which will vary across individuals.</p> <p>Whilst some progress has been made on matters raised by the Councils with regard to human health during the SoCG process, it is noted that Covid-19 has resulted in delays to discussing the matters presented in this SoCG due to the Councils' other commitments.</p> <p>The Applicants and the Councils will further discuss and refine the SoCG regarding human health matters and will include an updated Table 23 in an updated SoCG to be submitted at Deadline 3.</p>



## 2.9 Land Use

**Table 9 Applicants' Comments on Land Use**

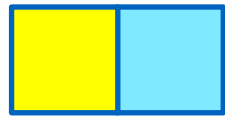
No.	Written Representation Number	Applicants' Comments
09	REP1-246, REP1-138, REP1-248, REP1-253, REP1-254, REP1-255, REP1-258, REP1-260, REP1-261, REP1-259, REP1-263, REP1-266, REP1-268, REP1-272, REP1-278, REP1-281, REP1-295, REP1-296, REP1-296, REP1-297, REP1-301, REP1-302, REP1-304, REP1-30, REP1-314, REP1-318, REP1-377, REP1-381, REP1-387, REP1-290, REP1-238, REP1-232, REP1-217, REP1-203	<p>Written Representations raised queries regarding the loss of agricultural land, the siting of onshore infrastructure on previously undeveloped (greenfield) land and the reinstatement of land.</p> <p>The Applicants have engaged with the Councils regarding land use through the SoCG process and have submitted a draft SoCG at Deadline 1 (REP1-072)</p> <p>The Applicants provided a <b>Land Use Clarification Note</b> at Deadline 1 (REP1-022). This note provided clarification on the impact significance methodology and rationale and the timings and the process of pre-construction land surveys and subsequent reinstatement.</p> <p>The Applicants provided responses to written questions from the Examining Authority at Deadline 1, specific responses regarding land use heritage can be found in <b>Applicants' Responses to Examining Authority's Written Questions Volume 11 – 1.9 Land Use</b> (REP1-114).</p>



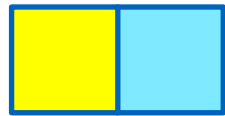
## 2.10 Landscape - Cable Route and Substations

**Table 10 Applicants' Comments on Landscape - Cable Route and Substations**

No.	Written Representation Number	Applicants' Comments
010	REP1-199, REP1-200, REP1-201, REP1-202, REP1-245, REP1-246, REP1-140, REP1-248, REP1-254, REP1-256, REP1-261, REP1-259, REP1-265, REP1-267, REP1-269, REP1-272, REP1-276, REP1-278, REP1-280, REP1-282, REP1-284, REP1-146, REP1-287, REP1-294, REP1-295, REP1-296, REP1-297, REP1-298, REP1-300, REP1-301, REP1-302, REP1-303, REP1-304, REP1-306, REP1-306, REP1-309, REP1-310, REP1-313, REP1-314, REP1-315, REP1-320, REP1-331, REP1-322, REP1-336, REP1-338, REP1-328, REP1-329, REP1-181, REP1-182, REP1-373, REP1-374, REP1-375, REP1-376, REP1-377, REP1-381, REP1-383, REP1-384, REP1-385, REP1-386, REP1-387, REP1-289, REP1-290, REP1-393, REP1-243, REP1-241, REP1-239, REP1-238, REP1-237, REP1-236, REP1-235, REP1-234, REP1-233, REP1-232, REP1-228, REP1-227, REP1-226, REP1-225, REP1-223, REP1-220, REP1-219, REP1-218, REP1-216, REP1-212, REP1-211, REP1-129, REP1-128, REP1-210, REP1-207, REP1-208, REP1-209, REP1-206, REP1-203	<p>The Applicants note concerns regarding the impacts of the cable route on the landscape and the Area of Outstanding Natural Beauty (AONB) and adequacy of landscape mitigation. The Applicant considers the landscape mitigation proposed to be appropriate.</p> <p>The Applicants have held SoCG meetings regarding landscape and visual impact assessment (LVIA) with the Councils, Natural England, SPS, and Suffolk Coast and Heaths AONB Partnership and submitted draft SoCGs at Deadline 1 (REP1-072, REP1-057, REP1-060, REP1-075 respectively).</p> <p>It should be note, as outlined in the <b>Project Update Note</b> 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.</p> <p><u>Impacts on the AONB</u></p> <p>The Applicants have prepared an note regarding <b>Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy</b> which has been submitted at Deadline 2 (document reference ExA.AS-5.D2.V1). This note provides further confirmation of the position regarding the potential for the Projects to bring about effects on the Suffolk Coast and Heaths AONB.</p>



No.	Written Representation Number	Applicants' Comments
		<p><u>Landscape Mitigation</u></p> <p>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.</p> <p>It should be noted, as outlined in the <b>Project Update Note</b> 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. These reductions allow for further refinement of mitigation plans. Further details including a selection of revised photomontages and an updated <b>OLEMS</b> and <b>OLMP</b> will be submitted at Deadline 3 reflecting these changes.</p> <p>In addition, the Applicants have submitted a <b>Sizewell C CIA Landscape and Visual Impact Assessment Clarification Note</b> at Deadline 2 (document reference ExA.AS-7.D2.V1). This note sets out the Applicants' clarification on potential cumulative landscape and visual effects of the Projects with SZC.</p>



## 2.11 Lighting Requirements

**Table 11 Applicants' Comments on Lighting Requirements**

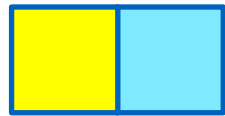
No.	Written Representation Number	Applicants' Comments
11	REP1-201, REP1-202, REP1-246, REP1-140, REP1-257, REP1-263, REP1-265, REP1-269, REP1-272, REP1-275, REP1-282, REP1-289, REP1-296, REP1-300, REP1-301, REP1-302, REP1-307, REP1-318, REP1-322, REP1-336, REP1-383, REP1-387, REP1-393, REP1-243, REP1-238, REP1-237, REP1-234, REP1-232, REP1-228, REP1-226, REP1-220, REP1-206	Written representations have been received regarding lighting requirements during construction, operation and maintenance and impacts on local wildlife.  The Applicants have no further comments regarding lighting requirements beyond that set out in <b>Table 14</b> of the <b>Applicants' Comments on Relevant Representations Volume 2: Individual Stakeholders (AS-035)</b> .



## 2.12 Noise and Vibration – Construction and Operation

**Table 12 Applicants' Comments on Noise and Vibration – Construction and Operation**

No.	Written Representation Number	Applicants' Comments
12	REP1-201, REP1-202, REP1-245, REP1-246, REP1-140, REP1-254, REP1-257, REP1-261, REP1-259, REP1-263, REP1-270, REP1-272, REP1-275, REP1-282, REP1-284, REP1-146, REP1-289, REP1-295, REP1-296, REP1-297, REP1-298, REP1-300, REP1-301, REP1-302, REP1-307, REP1-310, REP1-314, REP1-318, REP1-322, REP1-336, REP1-328, REP1-329, REP1-181, REP1-192, REP1-373, REP1-374, REP1-376, REP1-377, REP1-194, REP1-198, REP1-381, REP1-383, REP1-384, REP1-386, REP1-387, REP1-393, REP1-243, REP1-241, REP1-238, REP1-237, REP1-236, REP1-234, REP1-233, REP1-232, REP1-231, REP1-228, REP1-227, REP1-130, REP1-219, REP1-217, REP1-216, REP1-211, REP1-129, REP1-128, REP1-210, REP1-206	<p>Written Representations have been received regarding noise from the construction and operation of the Projects as well as cumulative impacts with SZC.</p> <p>As outlined in the <b>Project Update Note</b> 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.</p> <p>The Applicants have held SoCG meetings regarding noise and vibration with the Councils, and submitted a draft SoCG at Deadline 1 (REP1-072)</p> <p>A <b>Noise and Vibration Clarification Note</b> has been submitted at Deadline 2 (document reference ExA.AS-8.D2.V1). This clarification note addresses queries raised during the preparation of the SoCG with the Councils by Adrian James Acoustics Limited (AJA), who have been commissioned by East Suffolk Council to review the noise and vibration assessments included in the Applications. The note provides further information regarding the baseline survey, construction and operation phase assessment and consideration of alternatives.</p> <p>The Applicants will submit a Noise Modelling Clarification Note to the Examinations at Deadline 3 which will include information on the size and arrangement of modelled noise sources, mitigation measures incorporated into the noise model and at the dominant noise source for each receptor.</p> <p>The Applicants will undertake a review / assessment of the potential for impacts on sensitive ecological receptors (e.g. bats, birds) arising from predicted day-time and night-time operational noise levels at the onshore substations. This review / assessment will be submitted at Deadline 3.</p>



No.	Written Representation Number	Applicants' Comments
		<p>The Applicants have also prepared a Sizewell C CIA Clarification Note, which considers cumulative vibration impacts with SZC and has been submitted at this deadline. Although the SZC conclusions do not change the Projects' CIA conclusions set out within the Applications, the Applicants have provided further clarifications to highlight the relevant new information in the context of the original assessment with regards to transport and traffic. Given that this issue is related to traffic and transport, clarification has been provided in <b>Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)</b> (document reference ExA.AS-6.D2.V1).</p>

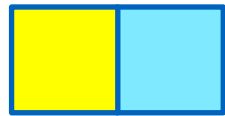




## 2.13 Offshore Ring Main and BEIS Review

**Table 13 Applicants' Comments on Offshore Ring Main and BEIS Review**

No.	Written Representation Number	Applicants' Comments
13	REP1-200, REP1-201, REP1-202, REP1-138, REP1-140, REP1-258, REP1-259, REP1-266, REP1-274, REP1-278, REP1-279, REP1-281, REP1-285, REP1-289, REP1-291, REP1-149, REP1-297, REP1-298, REP1-176, REP1-302, REP1-303, REP1-306, REP1-306, REP1-309, REP1-314, REP1-318, REP1-320, REP1-322, REP1-336, REP1-192, REP1-373, REP1-374, REP1-375, REP1-383, REP1-386, REP1-387, REP1-242, REP1-238, REP1-237, REP1-235, REP1-234, REP1-227, REP1-220, REP1-216, REP1-211, REP1-210	<p>A number of Written Representations raised queries regarding consideration of an offshore ring main and requests for the Department for Business, Energy and Industrial Strategy (BEIS) offshore transmission review to be taken into consideration with regards to the Projects.</p> <p>The Applicants welcome the Energy Minister's announcement on 15<sup>th</sup> July 2020 regarding a review into the existing offshore transmission regime. <b>Section 2.2 of the Submission for Oral Case: Preliminary meeting (Part 1)</b> (PDC-001) provides further information on offshore transmission review.</p> <p>The Applicants have progressed the Projects in line with the current regulatory regime for offshore transmission networks established by Ofgem. National Grid, in conjunction with offshore developers including ScottishPower Renewables, coordinated a study to look at an offshore ring main, and in 2015 it published its report 'Integrated Offshore Transmission Project (East) Final Report: Conclusions and Recommendations'. It examined, in the context of the East Anglia, Hornsea and Dogger Bank Round 3 Zones, the potential for offsetting the need for new onshore infrastructure by establishing an integrated design approach to the connection of these generation zones. This approach would include the use of inter-connection between offshore zones (via offshore transmission assets) and optimising connections to the onshore transmission system. The findings outlined a number of issues associated with a potential offshore ring main and concluded that in relation to an offshore ring main, "... the project team does not believe it would be economic and efficient to progress with the development of an integrated design philosophy or delivery of anticipatory assets at this time".</p> <p>Changes to a coordinated approach on offshore transmission would require regulatory change to deliver it and it is likely to be subject to public procurement. Given the considerable time periods that would be involved in developing this, the Applicants have a legitimate expectation</p>



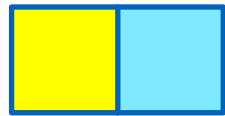
No.	Written Representation Number	Applicants' Comments
		<p>that the Projects will be considered within the current regulatory framework in line with paragraph 2.6.34 of NPS EN-3.</p> <p>The Applicants' note communications from Kwasi Kwarteng MP to SASES and SEAS which confirms</p> <p><i>"the timing of the review and the outputs are not expected to have an impact on projects at an advanced stage in the planning process".</i></p> <p>The correspondence has been provided in <b>Appendix 1 2, 3 and 4</b> of this document.</p> <p>It is clear that there are a number of barriers in place to an offshore ring main solution, including technological, economic, legal and regulatory barriers. The fact that there is currently no regulatory framework in place which would support an offshore ring main would not only constitute a regulatory barrier to the offshore ring main being a reasonable alternative for the Projects, but it would also result in unacceptable delays to the Project which would prevent them from achieving their objectives of delivering renewable energy within the current proposed timescales.</p>



## 2.14 Onshore Ecology

**Table 14 Applicants' Comments on Onshore Ecology**

No.	Written Representation Number	Applicants' Comments
14	REP1-201, REP1-202, REP1-246, REP1-140, REP1-250, REP1-255, REP1-256, REP1-260, REP1-261, REP1-266, REP1-267, REP1-268, REP1-270, REP1-279, REP1-284, REP1-285, REP1-287, REP1-289, REP1-295, REP1-296, REP1-297, REP1-298, REP1-301, REP1-304, REP1-308, REP1-310, REP1-313, REP1-314, REP1-318, REP1-320, REP1-322, REP1-336, REP1-338, REP1-182, REP1-374, REP1-376, REP1-377, REP1-381, REP1-383, REP1-385, REP1-387, REP1-289, REP1-393, REP1-242, REP1-238, REP1-237, REP1-235, REP1-234, REP1-233, REP1-231, REP1-226, REP1-220, REP1-219, REP1-211, REP1-129, REP1-128, REP1-210, REP1-203	<p>Written representations have been received regarding impact on designated sites, habitats and species and the mitigation measures and enhancement measures to be applied.</p> <p>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 the Councils (REP1-072). Outstanding matters are being discussed with Natural England and the Councils and relate to some of the conclusions and proposed mitigation (please see the SoCGs for details).</p> <p>The Applicants have submitted an <b>Onshore Ecology Clarification Note</b> (REP1-023) into the Examination at Deadline 1.</p> <p>The Applicants will submit an updated <b>OLEMS</b> (APP-584) into the Examination at Deadline 3, which will include a list of the pre-construction ecology surveys to be undertaken.</p> <p>The Applicants have submitted an <b>Ecological Enhancement Clarification Note</b> (REP1-035) at Deadline 1. The Applicants consider that this document demonstrates how they have considered enhancing biodiversity within the Applications and seeks to addresses concerns raised by the Councils.</p> <p>Through the SoCG with the Councils, the Applicants have agreed to review and provide clarification on operational noise impacts upon ecological receptors (birds and bats). A clarification note will be submitted to the Examination at Deadline 3.</p> <p>It should be noted, as outlined in the <b>Project Update Note</b> 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</p>



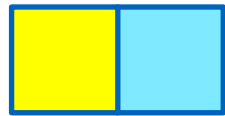
No.	Written Representation Number	Applicants' Comments
		project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the 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.



## 2.15 Onshore Ornithology

**Table 15 Applicants' Comments on Onshore Ornithology**

No.	Written Representation Number	Applicants' Comments
15	REP1-297, REP1-301, REP1-304, REP1-314, REP1-377, REP1-231, REP1-226, REP1-216	<p>Written representations have been received regarding impacts on ornithological receptors and impacts on the Sandlings Special Protection Area (SPA).</p> <p>The Applicants have held SoCG meetings regarding Onshore Ornithology with the Councils, Natural England, and the Royal Society for the Protection of Birds (RSPB) and draft SoCGs have been submitted at Deadline 1 (REP1-072, REP1-057). It should be noted that Natural England and the Applicants are in agreement on statements regarding the Existing Environment, Assessment Methodology and Assessment Conclusions. Statements on Mitigation and the DCO remain outstanding and under discussion. For the Councils some assessment conclusions and mitigation matters are outstanding.</p> <p>The Applicants submitted an <b>Outline SPA Crossing Method Statement</b> (REP1-043) at Deadline 1 which addressed many of the outstanding stakeholder concerns on mitigation. Discussions on mitigation at this location will continue.</p> <p>The Applicants will produce a clarification note presenting an assessment of ornithological impacts arising from day-time and night-time operational noise at the onshore substations. This clarification note will be submitted to the Examination at Deadline 3.</p> <p>It should be noted, as outlined in the <b>Project Update Note</b> 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.</p>



## 2.16 Policy and Legislation

**Table 16 Applicants' Comments on Policy and Legislation**

No.	Written Representation Number	Applicants' Comments
16	REP1-250, REP1-252, REP1-254, REP1, 271, REP1-303, REP1-336, REP1-338, REP1-328, REP1-329, REP1-192, REP1-219	<p>The Applicants note comments within Written Representations regarding over-arching policy drivers and need for the Projects.</p> <p>The Applicants have no further comments regarding the policy and legislation beyond that set out in <b>Table 20</b> of the <b>Applicants' Comments on Relevant Representations Volume 2: Individual Stakeholders</b> (AS-035).</p>



## 2.17 Project Description– Landfall

Table 17 Applicants' Comments on Project Description - Landfall

No.	Written Representation Number	Applicants' Comments
17	REP1-258, REP1-266, REP1-268, REP1-269, REP1-271, REP1-274, REP1-146, REP1-287, REP1-288, REP1-298, REP1-300, REP1-301, REP1-312, REP1-314, REP1-315, REP1-318, REP1-320, REP1-331, REP1-328 REP1-329, REP1-374, REP1-377, REP1-386, REP1-387, REP1-290, REP1-393, REP1-244, REP1-242, REP1-237, REP1-234, REP1-233, REP1-226, REP1-218, REP1-216, REP1-211, REP1-129, REP1-128, REP1-210, REP1-207, REP1-208, REP1-209, REP1-203	<p>The Applicants note queries raised in Written Representations regarding the approach to construction at the landfall.</p> <p>A commitment has been made to install the export cable at the landfall, using trenchless techniques, thus minimising disturbance to the cliffs and SSSI. Monitoring of the landfall will be undertaken as set out in section 3 of the <b>Outline Landfall Construction Method Statement</b> (REP1-042), submitted at Deadline 1.</p> <p>The <b>Outline Landfall Construction Method Statement</b> provides outline information regarding the trenchless technique works design and methodology respectively. Detailed parameters such as length, depth and angles of the drilling will be subject to detailed design and will be provided in the final Landfall Construction Method Statement which is secured under Requirement 13 of the <b>draft DCO</b> (APP-023). An updated draft DCO will be submitted at Deadline 3, and this will amend Requirement 13 to provide that the Landfall Construction Method Statement must accord with the <b>Outline Landfall Construction Method Statement</b>.</p> <p>The infrastructure associated with the trenchless technique at landfall has been appropriately sited based on the Applicants' identification of the potential 100-year erosion prediction line which allows for coastal erosion over the entire duration of the Projects Appendix 4.6 (APP-447)). The 100-year erosion prediction line is based on the current management measures of the shoreline management plan and additional analysis of the characteristics and behaviour of the shoreline as presented in <b>section 2 of Appendix 4.6</b>.(APP-447).</p>

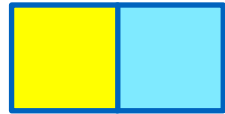


## 2.18 Project Description– Onshore Cable Route

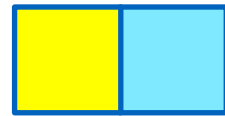
Table 18 Applicants' Comments on Project Description - Onshore Cable Route

No.	Written Representation Number	Applicants' Comments
18	REP1-201, REP1-246, REP1-250, REP1-254, REP1-256, REP1-258, REP1-260, REP1-263, REP1-264, REP1-268, REP1-274, REP1-276, REP1-278, REP1-281, REP1-146, REP1-287, REP1-288, REP1-289, REP1-295, REP1-297, REP1-298, REP1-300, REP1-301, REP1-302, REP1-306, REP1-306, REP1-308, REP1-309, REP1-314, REP1-315, REP1-331, REP1-336, REP1-338, REP1-328, REP1-329, REP1-181, REP1-192, REP1-373, REP1-375, REP1-376, REP1-377, REP1-381, REP1-383, REP1-384, REP1-385, REP1-386, REP1-290, REP1-392, REP1-393, REP1-244, REP1-237, REP1-235, REP1-234, REP1-233, REP1-228, REP1-226, REP1-223, REP1-221, REP1-219, REP1-218, REP1-217, REP1-216, REP1-215, REP1-212, REP1-211, REP1-129, REP1-210, REP1-203	<p>Written Representations have been received regarding the approach to construction of the onshore cable corridor, impacts to designated sites and roads.</p> <p>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. In addition, a Programme of Onshore Works will be provided at Deadline 3.</p> <p>The Applicants have submitted an <b>Onshore Crossing Schedule</b> at Deadline 1 (REP1-091) which provides information on all obstacles being crossed by the onshore cables. It is intended that open trenching be used in all cases where the cable route crosses the public highway. The process for open trenching for road crossings, which will maintain traffic use at all times, is described in <b>Chapter 6 Project Description</b> (APP-054) <b>sections 6.7.3.10.4 &amp; 6.7.3.10.5</b>.</p> <p>The EIA and draft DCO provide for either a trenchless or open-trench solution at the SPA crossing. The <b>Outline SPA Crossing Method Statement</b> (REP1-043) which has been submitted at Deadline 1, provides more information on each solution. This crossing is the subject of ongoing discussion with the Councils, Natural England and the RSPB.</p> <p>Sizewell Gap is a public road and the main access route to/from the Sizewell B Nuclear Power Station (operational) and the Sizewell A Site (under decommissioning). Works to be undertaken on Sizewell Gap for the Project relate to the construction, use and maintenance of two accesses from the public highway to the onshore development area (serving the</p>





No.	Written Representation Number	Applicants' Comments
		<p>landfall and onshore cable route) and vegetation management along the road side. These works are temporary in nature to service the construction and decommissioning of the Project.</p> <p>An <b>Outline Sizewell Gap Construction Method Statement</b> (REP1-041), which has been submitted at Deadline 1, provides details of the works to be undertaken on Sizewell Gap and the associated mitigation measures to ensure emergency access to/from the Sizewell B Nuclear Power Station is maintained at all times.</p>



## 2.19 Project Description - Onshore Substations

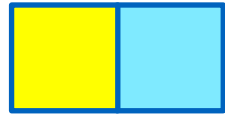
Table 19 Applicants' Comments on Project Description - Onshore Substations

No.	Relevant Representation Number	Applicants' Comments
19	REP1-202, REP1-245, REP1-246, REP1-138, REP1-140, REP1-141, REP1-250, REP1-252, REP1-254, REP1-255, REP1-257, REP1-258, REP1-260, REP1-263, REP1-265, REP1-267, REP1-268, REP1-272, REP1-274, REP1-278, REP1-280, REP1-281, REP1-282, REP1-146, REP1-285, REP1-287, REP1-288, REP1-294, REP1-295, REP1-297, REP1-298, REP1-300, REP1-302, REP1-307, REP1-308, REP1-309, REP1-310, REP1-314, REP1-315, REP1-318, REP1-322, REP1-336, REP1-338, REP1-328, REP1-329, REP1-181, REP1-192, REP1-373, REP1-375, REP1-376, REP1-381, REP1-384, REP1-385, REP1-386, REP1-290, REP1-391, REP1-393, REP1-241, REP1-240, REP1-239, REP1-237, REP1-236, REP1-235, REP1-234, REP1-232, REP1-228, REP1-227, REP1-226, REP1-225, REP1-223, REP1-221, REP1-220, REP1-218, REP1-216, REP1-215, REP1-212, REP1-211, REP1-210, REP1-206, REP1-203	<p>A number of Written Representations make reference to the size and scale of the onshore substation and the National Grid infrastructure.</p> <p>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. Selecting sites for the onshore substations and National Grid substation was a process that considered multidisciplinary principles and criteria that were selected based on well established guidelines. The process, along with the various options considered and the reasons for their dismissal / selection is fully detailed in section 4.9 of ES Chapter 4 Site Selection and Alternatives (APP052).</p> <p>It should be noted, as outlined in the <b>Project Update Note</b> 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.</p> <p>The Applicants have submitted an <b>Outline National Grid Substation Design Principles Statement</b> to Examination at Deadline 1 (REP1-046), and the Applicants will amend the <b>draft DCO (APP-023)</b> at Deadline 3 to require the final details of the layout, scale and external appearance of the National Grid substation to be in accordance with the Outline National Grid Substation Design Principles Statement.</p> <p>As detailed within the <b>draft Statement of Common Ground with National Grid Electricity Transmission plc</b>: (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)".</p>



**Applicants' Comments on Written Representations**  
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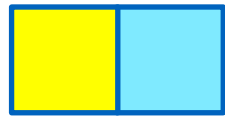
No.	Relevant Representation Number	Applicants' Comments
		<p>An update to the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) and <b>Outline Onshore National Grid Substation Design Principles Statement</b> will be submitted at Deadline 3 to provide further details of the proposed design process. It is the Applicants' intention to progress the detailed design with the Councils in the first instance from early 2021.</p>



## 2.20 Public Rights of Way

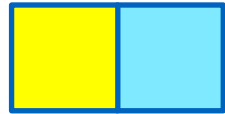
Table 20 Applicants' Comments on Public Rights of Way

No.	Written Representation Number	Applicants' Comments
20	REP1-201, REP1-202, REP1-245, REP1-246, REP1-138, REP1-255, REP1-261, REP1-270, REP1-272, REP1-278, REP1-279, REP1-280, REP1-284, REP1-288, REP1-295, REP1-296, REP1-298, REP1-301, REP1-302, REP1-304, REP1-307, REP1-308, REP1-313, REP1-336, REP1-338, REP1-373, REP1-377; REP1-385, REP1-386, REP1-387, REP1-391, REP1-393, REP1-243, REP1-241, REP1-238, REP1-237, REP1-236, REP1-228, REP1-227, REP1-217, REP1-129, REP1-128, REP1-206	<p>The Applicants note written representations raised queries regarding temporary closures / diversions of PRoW, permanent closures of PRoW and the historic parish boundary.</p> <p>A <b>Public Rights of Way Clarification Note</b> (REP1-049) was submitted a 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 (<b>Chapter 28 SLVA</b> (APP-076) and <b>Chapter 29 LVIA</b> (APP-077)), in addition to physical and mental wellbeing (<b>Chapter 27 Human Health</b> (APP-075)). Impacts on local businesses and tourism has been assessed in recognition of the PRoW network as a natural local asset (<b>Chapter 30 Tourism, Recreation and Socio-Economics</b> (APP-078)). Together, this forms a holistic view of the potential effects on the PRoW network as a local resource and on its users.</p> <p>Temporary diversions and management arrangements will be detailed within the PRoW Strategy which is secured under Requirement 32 of the <b>draft DCO</b> (APP-023) and which must be approved by the relevant planning authority after consultation with the relevant highway authority. An <b>Outline ProW strategy</b> 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.</p> <p>An updated <b>Outline ProW Strategy</b> (APP-581) will be submitted at Deadline 3 alongside an updated <b>draft DCO</b> (APP-023).</p> <p>An <b>Archaeology and Cultural Heritage Clarification Note</b> (REP1-021) was submitted at Deadline 1 in response to SoCG discussions with the Councils. This</p>



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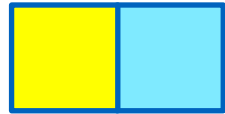
No.	Written Representation Number	Applicants' Comments
		note includes the PRow and parish boundary within the baseline and considers its influence as an element of the historic landscape character.



## 2.21 Seascape

Table 21 Applicants' Comments on Seascape

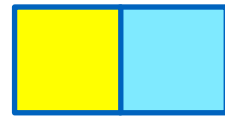
No.	Relevant Representation Number	Applicants' Comments
21	REP1-140, REP1-338, REP1-182, REP1-216	<p>A number of Written Representations were made which raised concerns with regards to the visibility of the turbines and impacts the Project may have on onshore receptors and the AONB.</p> <p>The Applicants have held SoCG meetings regarding offshore seascape landscape and visual amenity (SLVIA) with the Councils, Natural England, SPS, and Suffolk Coast and Heaths AONB Partnership and submitted draft SoCGs at Deadline 1 (REP1-072, REP1-057, REP1-060, REP1-075 respectively).</p> <p>The Applicants have made commitments to reduce potential impacts to offshore SLVIA by reducing the maximum tip height of wind turbines from 300m above Lowest Astronomical Tide (LAT) to 282m LAT as presented in the <b>Notice of Intent to make any Material or Non Material Changes</b> (REP1-039), This will be included in the update to the draft DCO at Deadline 3 .</p> <p>In Addition, the Applicants have reviewed the wording of Requirement 31 within the <b>draft DCO</b> (APP-023) and will amend it to secure the operation of aviation lights at the lowest permissible level. This amendment will be included in the updated <b>draft DCO</b> (APP-023) to be submitted during the Examination at Deadline 3</p> <p>The Applicants have prepared an note <b>Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy</b> which has been submitted at this Deadline (document reference ExA.AS-5.D2.V1). This note provides further confirmation of the position regarding the potential for the Projects to bring about effects on the Suffolk Coast and Heaths AONB.</p>



## 2.22 Socio-Economics – House Prices

**Table 22 Applicants' Comments on Socio-Economics - House Prices**

No.	Written Representation Number	Applicants' Comments
22	REP1-202, REP1-295, REP1-315, REP1-373, REP1-376, REP1-384, REP1-387, REP1-289, REP1-244, REP1-243, REP1-237, REP1-221	<p>A number of Written Representations have been received relating to possible reduction in value to properties.</p> <p>The Applicants have no further comments regarding house prices beyond that set out in <b>Table 29</b> of the <b>Applicants' Comments on Relevant Representations Volume 2: Individual Stakeholders</b> (AS-035).</p>

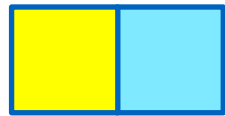


## 2.23 Tourism and Socio-Economics

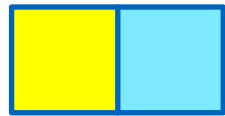
Table 23 Applicants' Comments on Tourism and Socio-Economics

No.	Topic / Issue	Written Representation Number	Applicants' Comments
23	Construction employment	REP1-174, REP1-199, REP1-202, REP1-245, REP1-246, REP1-140, REP1-252, REP1-255, REP1-256, REP1-257, REP1-258, REP1-260, REP1-259, REP1-266, REP1-271, REP1-272, REP1-280, REP1-282, REP1-289, REP1-297, REP1-298, REP1-300, REP1-302, REP1-304, REP1-307, REP1-308, REP1-309, REP1-313, REP1-315, REP1-318, REP1-320, REP1-331, REP1-322, REP1-338, REP1-328, REP1-329, REP1-181, REP1-182, REP1-373, REP1-375, REP1-376, REP1-194, REP1-381, REP1-382, REP1-383, REP1-384, REP1-385, REP1-386, REP1-387, REP1-393, REP1-242, REP1-241, REP1-240, REP1-238, REP1-237, REP1-236, REP1-231, REP1-228, REP1-226, REP1-130, REP1-222, REP1-220, REP1-219, REP1-218, REP1-216, REP1-212, REP1-211, REP1-129, REP1-128, REP1-210, EP1-207, REP1,-208, REP1-209	<p>Written Representations have been received regarding the impacts of the Projects on employment and tourism in the local area as well as cumulative impacts with SZC.</p> <p>Since submission of the Applications, the Applicants have been progressing discussions with the Councils on Tourism and Socio-Economics through the SoCG process and a number of agreements have been made regarding socio-economics (EIA existing environment, EIA assessment methodology and mitigation) (REP1-072).</p> <p>The Applicants provided responses to written questions from the Examining Authority at Deadline 1, specific responses regarding socio-economics can be found in <b>Applicants' Responses to Examining Authority's Written Questions Volume 17 – 1.17 Socio Economic Effects</b> (REP1-120).</p> <p>The Applicants undertook a proportionate assessment with regard to the impacts of the Projects. The CIA was undertaken on the basis of best available information on SZC at the time and the cumulative impact conclusions highlighted the potential for significant impacts with the inclusion of that project.</p> <p>The Applicant prepared a <b>Socio-Economics and Tourism Clarification Note (SZC CIA)</b> 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.</p> <p>The Applicants have been in consultation with The Suffolk Coast Destination Management Organisation (DMO) since early 2018 (see <b>Consultation Report, Table 4.7</b> (APP-029)). The Applicants would have included the findings of The</p>





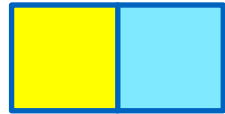
No.	Topic / Issue	Written Representation Number	Applicants' Comments
			<p>Energy Coast report (as cited in the DMO's Relevant Representation (RR-082) within the EIA if available within the timescales of the Projects' assessment. It was submitted just prior to the submission of the Applications in September 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 not ultimately changed the conclusions of the impacts of the Projects</p> <p><b>Appendix 13 Tourism Impact Review</b>, of the Applicants' Responses to ExA WQ1 (REP1-102) further investigates the predicted impacts upon tourism during the construction phase of the Projects.</p>



## 2.24 Traffic and Transport

Table 24 Applicants' Comments on Traffic and Transport

No.	Written Representation Number	Applicants' Comments
001	REP1-199, REP1-202, REP1-246, REP1-140, REP1-248, REP1-141, REP1-250, REP1-252, REP1-253, REP1-254, REP1-257, REP1-258, REP1-260, REP1-261, REP1-259, REP1-263, REP1-267, REP1-269, REP1-270, REP1-272, REP1-277, REP1-278, REP1-282, REP1-284, REP1-146, REP1-147, REP1-288, REP1-289, REP1-296, REP1-298, REP1-301, REP1-302, REP1-304, REP1-307, REP1-308, REP1-309, REP1-310, REP1-314, REP1-318, REP1-320, REP1-322, REP1-338, REP1-328, REP1-329, REP1-181, REP1-192, REP1-373, REP1-376, REP1-194, REP1-198, REP1-381, REP1-383, REP1-384, REP1-385, REP1-386, REP1-387, REP1-289, REP1-392, REP1-393, REP1-241, REP1-240, REP1-239, REP1-238, REP1-237, REP1-236, REP1-234, REP1-233, REP1-232, REP1-228, REP1-226, REP1-130, REP1-222, REP1-220, REP1-217, REP1-216, REP1-211, REP1-129, REP1-128, REP1-210	<p>Written Representations have been received regarding impacts of the construction of the Projects on Traffic and Transport in the local area as well as cumulative impacts.</p> <p>The Applicants have engaged with the Councils and Highways England through the SoCG process and have submitted draft SoCGs at Deadline 1 (REP1-072, REP1-065). The Applicants note that all matters are agreed in the SoCGs with Highways England.</p> <p>The Applicants are engaging with the Councils to address their concerns through the development of the SoCG (submitted at Deadline 1 (REP1-072)). To inform this process a series of clarification notes regarding Traffic and Transport have been / are being prepared. <b>Traffic and Transport: Deadline 1 Clarification Note</b> (REP1-048) has been submitted to the Examination at Deadline 1.</p> <p>A clarification note on potential cumulative effects with SZCis being prepared has been submitted at Deadline 2, <b>Sizewell C CIA (Traffic and Transport) Clarification Note</b> (document reference ExA.AS-6.D2.V1). A further Traffic and Transport Note will be provided at Deadline 3.</p> <p>The Applicants provided responses to written questions from the Examining Authority at Deadline 1, specific responses regarding traffic and transport can be found in <b>Volume 18 Applicants' Responses to WQ1 1.18 Transportation and Traffic</b> (REP1-121).</p> <p>The <b>Outline Access Management Plan</b> (APP-587), <b>Outline Construction Traffic Management Plan</b> (APP-586), and <b>Outline Travel Plan</b> (APP-588), will be updated and submitted into Examination at Deadline 3. In addition, an <b>Outline Port Travel Plan</b> will be submitted at Deadline 3. Requirement 36 of the draft</p>



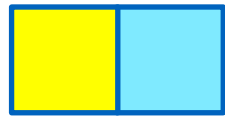
No.	Written Representation Number	Applicants' Comments
		<p>DCO (APP-023) requires a Port Travel Plan (PTP) to be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority.</p> <p>An <b>Outline Sizewell Gap Construction Method Statement</b> (REP1-041), which has been submitted at Deadline 1, provides details of the works to be undertaken on Sizewell Gap and the associated mitigation measures to ensure emergency access to/from the Sizewell B Nuclear Power Station is maintained at all times.</p> <p>Sizewell Gap is a public road and the main access route to/from the Sizewell B Nuclear Power Station (operational) and the Sizewell A Site (under decommissioning). Works to be undertaken on Sizewell Gap for the Project relate to the construction, use and maintenance of two accesses from the public highway to the onshore development area (serving the landfall and onshore cable route) and vegetation management along the road side. These works are temporary in nature to service the construction and decommissioning of the Projects.</p>



## 2.25 Water Resources and Flood Risk

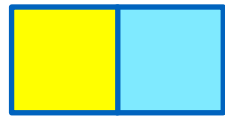
Table 25 Applicants' Comments on Water Resources and Flood Risk

No.	Written Representation Number	Applicants' Comments
25	REP1-246, REP1-138, REP1-261, REP1-267, REP1-281, REP1-284, REP1-290, REP1-297, REP1-298, REP1-300, REP1-302, REP1-307, REP1-310, REP1-314, REP1-318, REP1-322, REP1-336, REP1-373, REP1-377, REP1-383, REP1-386, REP1-387, REP1-393, REP1-242, REP1-238, REP1-236, REP1-235, REP1-233, REP1-232, REP1-231, REP1-228, REP1-227, REP1-220, REP1-207, REP1-208 REP1-209	<p>Written Representations have been received regarding the impact of the Projects on surface water runoff and flood risk and mitigation measures regarding flooding.</p> <p>The Applicants have engaged with the Environment Agency, East Suffolk Internal Drainage Board (IDB) and the Councils regarding water resources and flood risk through the SoCG process and have submitted draft SoCGs at Deadline 1 (EP1-077, REP1-072, REP1-078 respectively). All matters are agreed in the SoCGs with Environment Agency and East Suffolk IDB.</p> <p>The Applicants provided responses to written questions from the Examining Authority at Deadline 1, specific responses regarding traffic and transport can be found in <b><i>Applicants' Responses to Examining Authority's Written Questions Volume 9 – 1.7 Flood Risk, Water Quality and Resources</i></b> (REP1-112).</p> <p>The Applicants have prepared a <b><i>SuDS Infiltration Clarification Note</i></b> which has been submitted at Deadline 2 (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 (Table 13 of the Water Resources and Flood Risk Statement of Common Ground). SCC requested that the Applicants demonstrate compliance with the SCC guidance for SuDS design (2018) therefore this is also addressed in the Clarification Note.</p> <p>In addition, the Applicants will submit an <b><i>Outline Operational Drainage Management Plan</i></b> 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. A new requirement will be included in the updated <b><i>draft DCO</i></b> (APP-023) to be submitted at Deadline 3 which will require the</p>



**Applicants' Comments on Written Representations**  
Volume 3 Individual Stakeholders: 17<sup>th</sup> November 2020

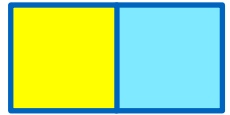
No.	Written Representation Number	Applicants' Comments
		submission and approval of an Operational Drainage Management Plan which must accord with the Outline Operational Drainage Management Plan.



## 2.26 Woodland

**Table 26 Applicants' Comments on Woodland**

No.	Relevant Representation Number	Applicants' Comments
26	REP1-246, REP1-138, REP1-140, REP1-259, REP1-270, REP1-318, REP1-336, REP1-192, REP1-381, REP1-383, REP1-289, REP1-393, REP1-238, REP1-128	<p>A number of Written Representations have been received regarding the impact of the Projects on woodland.</p> <p>The Applicants have engaged with the Councils and Natural England regarding woodland as part of the onshore ecology SoCG and have submitted draft SoCGs at Deadline 1 (REP1-072, REP1-057).</p> <p>The Applicants will provide a Clarification note on semi-natural broadleaved woodland to be submitted at Deadline 3.</p>



# Appendix 1: Letter concerning the BEIS Review to The Rt. Hon. Dr Kwasi Kwarteng 3 Aug 2020

# Letter concerning the BEIS Review to The Rt. Hon. Dr Kwasi Kwarteng 3 Aug 2020



3 August 2020

By Email Only:

[enquiries@beis.gov.ukkwasi.kwarteng.mp@parliament.uk](mailto:enquiries@beis.gov.ukkwasi.kwarteng.mp@parliament.uk)



The Rt. Hon. Kwasi Kwarteng

Minister for Business, Energy and Clean Growth

Department for Business, Energy & Industrial Strategy

1 Victoria Street

London

SW1H 0ET

Dear Minister

OFFSHORE TRANSMISSION NETWORK REVIEW  
("REVIEW")

SASES and SEAS are two groups of East Suffolk residents which have been seeking to find a more sustainable way for offshore energy to be brought onshore and connect to the National Grid. As you are aware East Suffolk is overburdened with energy projects with eight offshore projects planned for our area together with the proposed development of Sizewell C, all of which will involve development in the Suffolk Coasts and Heaths AONB. In addition other parts of the UK, most notably Norfolk, have similar issues with the onshore impacts of offshore energy. Accordingly we were delighted to learn of the "Offshore Transmission Network Review" and we have carefully reviewed the Terms of Reference ("TOR").

We strongly endorse the view that offshore green energy is a good thing. We also share the view that the onshore connections of offshore developments must not cause considerable irreparable damage to coastal communities and the environment, which is the present position in the absence of any overarching, holistic, approach.

We are of course confident that this Review is intended to be a serious exercise and not one designed to push the concerns of those whose communities and lives are badly affected by onshore connections into the long not so “green” grass.

In these circumstances we note that the TOR does not set out any details of the way in which the Review is to take place save to say that it will “be led by the Department for Business, Energy & Industrial Strategy (BEIS) with support from a range of government and Industry bodies and an industry expert group.” It also refers to future consultations.

You will appreciate that representatives from outside of the industry and sector will wish to be satisfied that the Review group is objective and independent and not dominated by industry representatives whose interests will be at odds with those of onshore communities.

Could you please assist in answering the following questions.

1. When the TOR was being drafted did BEIS consult with the industry? If so why did it not consult also with representatives of onshore communities?
2. Who is to lead the Review?

3. Will that person be independent of industry, and if not why not?
4. How large will the Review team be?
5. What range of specialist qualifications will the Review team have?
6. What powers will the Review team have to call for evidence or verify the accuracy and objectivity of submissions provided to them?
7. The TOR refers to the group including “Industry” bodies and an “Industry” expert group. Why does the membership not include representatives of onshore communities?
8. How will you ensure that these “industry” groups do not dominate the agenda and serve their own commercial interests?
9. Why are the TOR drafted to exclude projects where connection is to occur before 2026? This substantial exclusion seems to be explicitly designed to enable existing projects to be waved through irrespective of the damage that they might cause to local, onshore, environments and communities. Over the next few years huge damage to onshore communities could be caused by existing plans.
10. The issue being reviewed is one of real complexity - what is the time scale anticipated for a report? The TOR refers to an “update by the end of the year, with a view to providing clarity for an enduring approach in 2021”. What is meant by this?
11. If “clarity” is sought in 2021 does this assume that the

entire Review will be completed relatively early in 2021? If so, how can the Review team ensure thoroughness?

12. Can you please confirm that the Secretary of State will, when taking decisions about current DCO applications, which will using the terminology in the TOR “connect to the onshore network”, take the conclusions of the Review into account in addressing any recommendations from the relevant Examining Authorities.

We look forward to hearing from you.

Yours sincerely

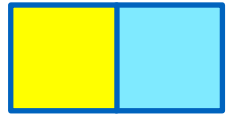
Michael Mahony

SASES

Fiona Gilmore

SEAS

cc Therese Coffey MP, George Freeman MP  
Suffolk County Council - Matthew Hicks, Richard Rout, Andrew Reid  
East Suffolk Council - Steve Gallant, Craig Rivett, James Mallinder,  
Jocelyn Bond



## **Appendix 2: Reply from Rt. Hon. Kwasi Kwarteng MP, Minister of State for Business, Energy and Clean Growth, 1st September 2020 to SEAS and SASES**

# Reply from Rt. Hon. Kwasi Kwarteng MP, Minister of State for Business, Energy and Clean Growth, 1st September 2020 to SEAS and SASES

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Michael Mahony  
SASES

Fiona Gilmore

SEAS

By email:

Our ref: MCB2020/27654/NB

1 September 2020

Dear Michael and Fiona,

Thank you for your letter of 3 August, regarding the recent launch of the offshore transmission network review.

I appreciate your support for the recently launched offshore transmission review. My Department is aware of the importance of this work in balancing the need to increase our renewable capacity whilst minimising the costs to the environment and society where possible. In response to your questions I would like to offer some additional detail regarding how the review is being run and the next steps we have planned.

The terms of reference (ToR) for the review were developed collaboratively between my Department and the other organisations involved in the delivery of the review, including



Ofgem, National Grid ESO and The Crown Estate. We published the ToR to signal to interested stakeholders that we are committed to investigating how the current regime could be amended to alleviate the concerns being raised by groups such as your own. We also wanted to ensure that it is clear to stakeholders that the work already underway by some organisations forms part of a broader, centrally led, project.

The ToR clearly establishes two separate strands of the review, one to focus on the medium term to explore what can be done within the existing framework, and one to design and implement an enduring regime for the longer term. This approach is designed to account for the different stages of development of projects already in the pipeline. Due to the long lead times for offshore wind projects (8-10 years) many projects connecting before 2025 are either already consented or nearing the end of the consenting process. Introducing regulatory uncertainty and changing plans for well advanced projects would increase costs for consumers and make meeting ambitious 2030 and 2050 targets even more challenging. However, the review does commit to consider opportunities for projects at an earlier stage of development, and how these can be incentivised.

My officials will take the overall lead in the review, drawing together the expertise of the organisations involved in the delivery of offshore wind. As you mention in your letter, we are also seeking to establish an independent expert group of technical experts. The role of this group is to scrutinise the outputs of the review and provide critical feedback from an

independent standpoint. We are currently working to develop the terms of reference for this group to ensure it is able to offer impartial advice and to design a transparent process for recruiting the members.

At present we are working closely with the other organisations involved in the delivery of the review to fully develop the program of work. Once complete, we intend to share this detail with a broad range of stakeholders at a virtual webinar in the Autumn. Our intention regarding the enduring regime is to communicate the direction of travel during 2021; as you rightly state, this is a very complex issue that touches on many policy areas across several organisations. We do, however, expect that a significant portion of the work will be completed during 2021, so that clarity can be provided for those projects connecting after 2030.

I understand the importance of engagement with stakeholders, including groups such as SASES and SEAS. As work progresses the review will provide regular updates for external stakeholders to ensure progress of the review is communicated and that there is early and regular opportunity for challenge. For example, my policy officials leading the review regularly attend the Suffolk Energy Coast Delivery Board to give updates. Further information on how you can engage with the review will be shared on the Government website in the Autumn.

Finally, regarding the current DCO applications, as these will be for the Secretary of State to determine, I cannot comment on these specific applications. However, as outlined above, the

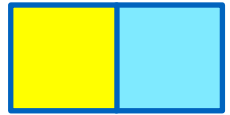
timing of the review and the outputs are not expected to have an impact on projects at an advanced stage in the planning process. When making decisions on applications under the Planning Act 2008, the Secretary of State will, of course, have regard to any matters which he thinks are both important and relevant to his decision.

Thank you again for taking the time to write. I hope you find this information useful.

Yours sincerely,

RT HON KWASI KWARTENG MP

Minister of State for Business, Energy and Clean Growth



## **Appendix 3: 2nd Letter concerning the BEIS Review to The Rt. Hon. Dr Kwasi Kwarteng, 7 September 2020**

# 2nd Letter concerning the BEIS Review to The Rt. Hon. Dr Kwasi Kwarteng, 7 September 2020



SUFFOLK  
ENERGY ACTION  
SOLUTIONS



7 September 2020

The Rt. Hon. Dr Kwasi Kwarteng  
Minister for Business, Energy and Clean Growth  
Department for Business, Energy & Industrial Strategy  
1 Victoria Street

London  
SW1H 0ET

By Email Only: minister.kwartengcorrespondence@beis.gov.uk

Dear Minister

## **OFFSHORE TRANSMISSION NETWORK REVIEW ("REVIEW")**

Thank you for your letter of 1st September 2020 responding to our letter of 3rd August 2020.

We are pleased that you recognise that the concerns of groups such as ours need to be addressed.

### **Suffolk Energy Coast Delivery Board**

Before turning to matters specifically relating to the Review we would just like to comment on your reference to the Suffolk Energy Coast Delivery Board. You may not be aware but this board lacks any transparency. The members of this board are not disclosed, the dates of its meetings are not disclosed, it meets in private and no documents relating to its deliberations are published, not even minutes of its meetings. Can this total

absence of transparency be remedied please, both for the past and for the future.

### **Friston and the TOR**

Having read the letter we are unclear as to the scope of the TOR. You will of course appreciate that the immediate concern of ours which needs to be addressed are the DCO applications recently made by Scottish Power for consents for the vast substation complex proposed to be constructed adjacent to the ancient village of Friston in Suffolk. The evident intention behind the applications is that, once consents are obtained, the site will also be used for a series of further substations and infrastructure, much of which is to be constructed by the National Grid group.

A number of questions posed in our earlier letter were intended to seek confirmation that our concern that the proposed substation complex at Friston had been excluded from the review was unfounded. With respect, that specific question has not been clearly answered.

In your letter you suggest that projects that are “nearing the end of the consenting process” are excluded.

Can we therefore take it that the present DCO applications for Friston, **for which the examination process has yet to start**, and which has been delayed by the Covid crisis, is not being treated as nearing the end of a consenting process. In other words it falls within the scope of the Review. As you are aware the TOR state that *“the medium-term workstream will seek to:*

- identify and implement changes to the existing regime to facilitate coordination in **the short-medium term** [emphasis added]
- assess the feasibility and costs/benefits of centrally delivered, enabling infrastructure to facilitate the connection of increased levels of offshore wind **by 2030** [emphasis added]
- **explore early opportunities for coordination** [emphasis added] through pathfinder projects, considering regulatory flexibility to allow developers to test innovative approaches
- focus primarily on projects expected to connect to the onshore network **after 2025** [emphasis added]

Our understanding of your letter and the TOR is that the Scottish Power projects including the proposed Friston substation complex are **not** excluded and are therefore **included** in the Review. Please confirm that our understanding is correct and provide us with a clear and unequivocal response.

### **Representation in the Review**

We note that those conducting the Review and the proposed expert group advising them do not include anyone who might have an interest in opposing, or who are concerned about, the inappropriate development of large scale onshore



infrastructure. As you know we are strongly in favour of offshore wind energy but are deeply concerned by the uncoordinated, inefficient and environmentally damaging onshore developments being proposed to support offshore energy. Your letter explains that National Grid ESO has played a part in developing the TOR. It has a clear interest in minimising the ability of groups, such as ours, to have an input into the Review since this might be adverse to their own private commercial interests. Indeed they will have a long term commercial stake in the Friston substation complex.

Can you please explain (i) why groups such as ours have been excluded, (ii) whether local authorities have been included or excluded and (iii) the steps that you will take to ensure that the Review is truly independent and impartial aside from the establishment of an independent expert advisory group.

Further can you please confirm that we will be invited to the virtual webinar which is scheduled for the Autumn.

### **Other Offshore Electricity Projects**

The Review is focused on the offshore transmission regime and its onshore impacts. Whilst the Review may have been prompted by the need to develop offshore wind generation, could you please confirm that the Review will address the onshore impacts of all offshore electricity projects including both UK and international offshore interconnector projects.

## **Next steps**

We look forward to your response. We are all keen to ensure that this Review does not become, what many already fear, an exercise in throwing potential opposition to uncoordinated, inefficient and environmentally damaging onshore energy developments into the longest of long grass. We would ask for a quick response. Please note we intend to publish all of the correspondence passing between us.

Yours sincerely

Michael Mahony  
SASES

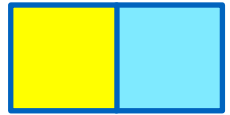
Fiona Gilmore

SEAS

cc Therese Coffey MP, George Freeman MP

Suffolk County Council - Matthew Hicks, Richard Rout, Andrew Reid, Russ Rainger

East Suffolk Council - Steve Gallant, Craig Rivett, James Mallinder, Jocelyn Bond



# **Appendix 4: 2<sup>nd</sup> Reply from Rt. Hon. Kwasi Kwarteng MP, Minister of State for Business, Energy and Clean Growth, 18th September 2020 to SEAS and SASES**

# 2nd Reply from Rt. Hon. Kwasi Kwarteng MP, Minister of State for Business, Energy and Clean Growth, 18th September 2020 to SEAS and SASES

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Michael Mahony  
SASES

Fiona Gilmore

SEAS

By email: to Michael Mahoney

Our ref: MCB2020/30213

Your ref: 27654

18th September 2020

Dear Michael and Fiona,

Thank you for your letter dated 7 September, following up on our previous engagement last month. Please see responses below to your further questions.

### Scope of the review

The ambition of the medium-term work stream is to enable and incentivise as much coordination as possible within the bounds of the existing regime. However, as you will appreciate, it is not possible for us to mandate projects to alter existing plans given that they have been designed and funded based on the existing regime. Not only would changes to some projects at a

later stage of development incur significant additional costs for consumers, it could also have a detrimental impact on investor confidence in the UK offshore wind industry and jeopardise our long-term goal to achieve net zero emissions by 2050.

While the projects you mention are yet to enter the examination phase of the planning process, at this point project developers have completed a significant amount of consultation on their designs for connecting and constructing their assets. This process began in Autumn 2017 for the projects you mention with the final stages, including the examination process, scheduled to take a maximum of 12 months. Therefore, these projects are three quarters of the way through the consenting process.

As previously mentioned, we are not in a position to mandate changes to projects already in the pipeline under the existing regime and it will be up to individual developers as to whether or not they wish to make changes. This will need to be considered in terms of the costs and delays that will be incurred for a specific project, versus the potential benefits that may be realised.

The intention of Government is, where possible, to provide support and incentives to drive change in the medium term ahead of implementing the enduring regime. However, it is unlikely that this will be able to capture all projects that are due to connect between 2025-2030 given the various stages of development the individual projects are at.

Stakeholder engagement

I note your comments relating to the transparency of the Suffolk Coast Energy Delivery Board, which you have also copied to relevant colleagues. This group has provided a useful route for BEIS to engage with Local Authorities in the region and to further understand the challenges being faced in terms of the development of energy infrastructure. At present, BEIS and the other organisations involved in delivering the review are carefully considering how best to engage with broader stakeholder groups such as yourselves, so that we ensure the experiences of coastal communities are reflected. In the Autumn we intend to inform a

wide range of stakeholders about the details of the review, including timelines and expected outputs. Details of this engagement will be shared via our website.

I would also like to reassure you that the National Grid Electricity System Operator (NGESO) does not own any transmission assets or receive any of its remuneration on the basis of their construction or operation and has been a legally separate company within the National Grid Group since April 2019. This separation was introduced to address perceived conflicts of interest between the ESO and National Grid Electricity Transmission. Under the terms of separation, commercial information may not be shared between the ESO and the National Grid Group and this is overseen by Ofgem who actively monitor compliance with the terms of separation.

You may have seen that NGESO is conducting vital work for the review that is considering, a cost benefit analysis of various integrated designs, reviewing the connections process, and reviewing technology available to deliver these solutions. This



has involved significant stakeholder engagement and a consultation will be launched at this end of this month to gather further input. If you have not participated in this work to date, I would encourage you to take part. More details can be found on the NGENSO website.<sup>1</sup>

### Other offshore electricity projects

While the core focus of the review, particularly in the medium term, is the connection of offshore wind, for the longer term we are looking to design an enduring regime that facilitates the coordination of offshore infrastructure more generally. In the current scope of the review there is a specific workstream to consider international interconnector projects and the potential for hybrid offshore wind/interconnector projects to help minimise impacts on coastal communities. The review will also consider how onshore reinforcements could form part of an integrated solution. We are also aware of the growing interest in hydrogen and while this is not in the immediate scope of the review we are working to ensure that any recommendations consider the potential impacts on the development and possible integration of these more novel technologies in the future.

Thank you again for writing. I hope you find this information helpful.

Yours sincerely,

RT HON KWASI KWARTENG MP

Minister of State for Business, Energy and Clean Growth

[www.nationalgrideso.com/future-energy/projects/offshore-coordination-project](http://www.nationalgrideso.com/future-energy/projects/offshore-coordination-project)