

## The Planning Act 2008

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

Planning Inspectorate Reference: EA1N – EN010077 &  
EA2 – EN010078

Deadline 2 - 17 November 2020

East Suffolk Council's Response to Additional  
Information Submitted by Applicants at Deadline 1

## **Review of Additional Information Submitted by Applicants at Deadline 1**

### **1. Introduction**

- 1.1. East Suffolk Council (ESC) has noted that the following additional information, clarification notes and methods statements were submitted by the Applicants at Deadline 1 which are of relevance to the Council's responsibilities:
- Outline Landfall Construction Method Statement (OLCMS) (Doc Ref: ExA.AS-2.D1.V1 – EA1N and EA2)
  - Ecological Enhancement Clarification Note (Doc Ref: ExA.AS-16.D1.V1)
  - Outline SPA Crossing Method Statement (Doc Ref: ExA.AS-3.D1.V1 – EA1N and EA2)
  - Onshore Ecology Clarification Note (Doc Ref: ExA.AS-12.D1.V1)
  - Air Quality Clarification Note (Doc Ref: ExA.AS-20.D1.V1)
  - Outline National Grid Substation Design Principles Statement (Doc Ref: ExA.AS-6.D1.V1 - EA1 and EA2)
  - Land Use Clarification Note (Doc Ref: ExA.AS-11.D1.V1)
  - Archaeology and Cultural Heritage Clarification Note (Doc Ref: ExA.AS-10.D1.V1)
  - Socio-Economic and Tourism Clarification Note (Doc Ref: ExA.AS-17.D1.V1)
  - Notice of Intent to Make Non-material or Material Changes (ExA.AS-1.D1.V1)
  - Application for the Inclusion of Additional Land (ExA.AS-18.D1.V1 – EA1N and EA2)
- 1.2. The Council has reviewed these documents and provided comments in relation to each document separately. The comments relate to both EA1N and EA2 projects.
- 1.3. The comments contained within this document are from ESC with the exception of the comments prepared in response to the Archaeology and Cultural Heritage Clarification Note which have been prepared jointly with Suffolk County Council (SCC). The Council continues to work closely with SCC on these projects but to avoid repetition, each Council will lead on specific topic areas as set out in the Councils joint Local Impact Report.

## **2. Outline Landfall Construction Method Statement (Doc Ref: ExA.AS-2.D1.V1 EA1N & EA2)**

- 2.1. ESC is satisfied that the Outline Landfall Construction Method Statement (OLCMS) Rev 01 submitted at Deadline 1 covers Coralline Crag impact avoidance, management of cliff destabilisation by vibration risk and other matters relating to the planning of works with regard to potential coastal change, to an acceptable standard.
- 2.2. ESC also welcomes the commitment in paragraph 15 which provides assurance that no equipment or machinery associated with the landfall will be operated or stored within the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI).
- 2.3. The draft Development Consent Orders (DCOs) will need to be updated to include the OLCMS as a certified document and the wording of Requirement 13 updated to reflect that the final Landfall Construction Method Statement (LCMS) must accord with the OLCMS.

### **3. Ecological Enhancement Clarification Note (Doc Ref. ExA.AS-16.D1.V1)**

#### *General*

- 3.1. ESC welcomes details of how the Applicants intend to deliver ecological enhancement as part of the projects as it is a matter that the Council has raised at each consultation stage and through the Statement of Common Ground engagement process.

#### *Section 1 - Introduction*

- 3.2. The Applicants position on Biodiversity Net Gain (as set out in the Environment Bill (2020)) and its applicability to Nationally Significant Infrastructure Projects is understood and accepted.

#### *Section 2 - Proposed Methodology*

- 3.3. The calculation of the baseline biodiversity value of the projects area using the DEFRA Biodiversity Metric 2.0 is welcomed. ESC understands that the calculation is made on a 'worst case' basis (i.e. it covers the whole of the projects red line area) (section 2, paragraph 10). However, given the need for a precautionary approach and the fact that many of the construction details are not yet available, this is considered to be a necessary approach.

#### *Section 3 - Biodiversity Baseline*

- 3.4. Please note that ESC has not carried out a full, in depth, cross reference of the Extended Phase 1 Habitat Survey dataset and the calculations presented in this Clarification Note. The information presented has been taken as correct.

#### *Section 4 - Ecological Enhancement and Habitat Creation*

- 3.5. Section 4.1 (paragraph 32) – As identified in paragraph 32 delivery of ecological enhancement via the proposed habitat creation is reliant on long term appropriate management being secured. ESC considers that securing an adaptive management and monitoring plan is a vital part of these projects.
- 3.6. Table 3 – This table states that 85.59km of new hedgerow planting will be provided at the substations. This figure appears excessive as the Outline Landscape Mitigation Plan (OLMP) General Arrangement drawing (ref. 29.11a) only appears to show approximately 5km of new hedgerow planting. Further clarification in relation to this matter is required.

- 3.7. Table 4 (Hedgerows – Onshore Substations and Cable Route) – ESC considers that improvements made to hedgerows immediately adjacent to removed sections are more likely to constitute mitigation, rather than enhancement.
- 3.8. Table 4 (Cable Route) – All of the measures identified as ecological enhancement as part of the onshore cable route in Table 4 are actually mitigation/compensation measures.

#### *Section 5 - Conclusion*

- 3.9. Whilst the clarification note does set out the habitat baseline, the habitat unit loss and the habitat unit creation proposed in the developments, ESC does not consider that it demonstrates that the projects will deliver overall ecological enhancement.
- 3.10. The assessment presented relies on the use of part of the DEFRA Biodiversity Metric 2.0 to calculate the habitat unit totals, however then simply comparing the absolute values does not demonstrate that ecological enhancement is likely to be achieved as it ignores the differing values of each of the habitat types. Also, if based purely on a comparison of units lost vs units created, the projects result in a net loss of non-linear (i.e. non-hedgerow) habitat units. Excluding arable units (which are the predominant habitat type lost but which are of low ecological value), 81 habitat units will be lost but only 71 created. In addition, whilst we acknowledge that the presented number of hedgerow units gained through new planting appears considerable (a net gain of 497 new units plus 8 enhanced units), we query whether the figures presented are correct and seek clarification on these (please see our comment under Section 4, Table 3). In order to assist the understanding of the figures presented, it would be beneficial if the Applicants produced a map to illustrate the hedgerow units created.

#### **4. Outline SPA Crossing Method Statement (Doc Ref: ExA.AS-3.D1.V1 EA1N & EA2)**

##### *General*

- 4.1. ESC welcomes the additional information that has been provided in relation to the two potential Special Protection Area (SPA) crossing construction methods. We have previously commented on drafts of this Method Statement.
- 4.2. Document reference ExA.AS-3.D1.V1 is titled as being for the East Anglia ONE North project, however at various points (e.g. Section 2.5, paragraph 39) it refers to “the Project” being constructed simultaneously with East Anglia ONE North suggesting that this document actually relates to the East Anglia TWO project. This may however just be an error in drafting.

##### *Section 2 - Open Trenched Technique*

- 4.3. Section 2.9.3 (Nightingale Mitigation) – Paragraph 63 – As a point of clarification, Work No. 12A is not predominantly horse paddock. It is an area of grassland with scattered scrub and a hedgerow along the eastern boundary.

##### *Section 3.12 - Measures to Prevent Bentonite Mud Break-out*

- 4.4. Paragraph 116 – This paragraph refers to ground investigations being undertaken along the Horizontal Directional Drill profile, which crosses the SPA. However, no details about how or when these investigations will be undertaken is provided and therefore it has not been demonstrated that these works will not result in an adverse impact on the designated features of the SPA. If a trenchless construction technique is selected, more details on these investigations needs to be provided so that their potential impacts can be assessed and suitably mitigated. As a minimum it would be expected that the investigation works would be undertaken following the timings set out for the open trenched crossing technique to avoid impacts on breeding birds.
- 4.5. The Council has no further comments on this document.

## **5. Onshore Ecology Clarification Note (Doc Ref. ExA.AS-12.D1.V1)**

### *Section 2 - Level of Importance Assigned to Badgers*

- 5.1. ESC agrees with the clarification put forward in relation to the level of importance assigned to badgers. Badgers are a protected species (under the Protection of Badgers Act (1992)) and therefore any impacts on them, based on up to date pre-construction surveys, will need to be adequately mitigated as part of the relevant Ecological Management Plans (EMPs) (as secured as part of Requirement 21).

### *Section 3 - Assessment of Impacts upon Hairy Dragonfly*

- 5.2. ESC notes the clarification put forward and has no comment to make on impacts on this species.

### *Section 4 - Impacts to Ecological Receptors Arising from Airborne Nitrogen Oxide (NOx) Concentrations and Acid Deposition) (NB. this also relates to Section 3 of the Air Quality Clarification Note (Doc. Ref. ExA.AS-20.D1.V1)*

- 5.3. ESC considers that NOx and acid deposition contributions from construction road traffic upon ecological receptors have been adequately assessed and no further clarification is required.

### *Section 5 - Impacts to Ecological Receptors as a Result of Non Road Mobile Machinery (N.B. This also relates to Section 4 of the Air Quality Clarification Note (Doc. Ref. ExA.AS-20.D1.V1)*

- 5.4. *Construction Consolidation Sites (CCSs):* The description of the CCSs shows that significant plant could be located at these sites and operated continuously. The CCSs would be located as close as 250m from the Sandlings SPA/Leiston-Aldeburgh SSSI. No details are provided of the expected capacity and operational regime of plant at the CCSs, or vehicle movements to/from these sites. Based on the information provided, and in view of the proximity of CCSs to the SSSI/SPA, it is not clear that it can be concluded that “significant impacts are unlikely”, even with appropriate mitigation in place. Emissions from plant and equipment at this site can be mitigated by ensuring that Non Road Mobile Machinery (NRMM) conforms with Stage V controls (i.e. as set out in Annex II of regulation (EU) 2016/1628, as referred to in the outline Code of Construction Practice), and ensuring that any HGVs used at the site conform with Euro VI emission limits, but it is not clear whether further measures would also be necessary. The potential impacts on the SPA/SSSI should be verified (e.g. through the means of a screening model calculation). This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.

- 5.5. The outline approach to NRMM assessment has been agreed by the Council and our air quality consultant, and the Applicants and their air quality consultant. ESC also note that the clarification notes acknowledge that there will be further quantitative assessment submitted for examination during Deadline 3 and consider that additional mitigation measures are likely to be available should the assessment demonstrate that these are required.
- 5.6. *Trenching:* The description of emissions from construction plant during trenching shows that a small number of plant would be used for a limited period. This is unlikely to result in a significant impact at the Sandlings SPA/Leiston-Aldeburgh SSSI, provided effective mitigation is in place. Emissions from plant and equipment at this site can be effectively mitigated by ensuring that NRMM conforms with Stage V controls (i.e. as set out in Annex II of regulation (EU) 2016/1628, as referred to in the outline Code of Construction Practice), and ensuring that any HGVs used at the site conform with Euro VI emission limits. However, in view of the presence of this activity within the protected area, the lack of significant impacts on the SPA/SSSI should be demonstrated by the Applicants (e.g. through the means of a screening model calculation). This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition, particularly as it has not been established that trends in vehicle emissions in the local area will match national projections.
- 5.7. As with the CCSs, the outline approach to NRMM assessment has been agreed by the Council and our air quality consultant, and the Applicants and their air quality consultant. ESC also note that the clarification notes acknowledge that there will be further quantitative assessment submitted for examination during Deadline 3 and consider that additional mitigation measures are likely to be available should the assessment demonstrate that these are required.



## **6. Air Quality Clarification Note (Doc Ref: ExA.AS-20.D1.V1)**

*Section 2 - Consideration of the latest Institute for Air Quality Management's (IAQM) Ecological Guidance Document.*

- 6.1. The Applicants have addressed outstanding requirements of the IAQM guidance, the ESC is content with this response.

*Section 3 – Impacts to Ecological Receptors Arising from Airborne NO<sub>x</sub> Concentrations and Acid Deposition (N.B. This also relates to Section 4 of the Ecology Clarification Note (Doc. Ref. ExA.AS-12.D1.V1))*

- 6.2. ESC considers that NO<sub>x</sub> and acid deposition contributions from construction road traffic upon ecological receptors have been adequately assessed and no further clarification is required.

*Section 4 – Impact to Ecological Receptors as a Result of Non Road Mobile Machinery Emissions (N.B. This also relates to Section 5 of the Ecology Clarification Note (Doc. Ref. ExA.AS-12.D1.V1))*

- 6.3. *Construction Consolidation Sites (CCSs):* the description of the CCSs shows that significant plant could be located at these sites and operated continuously. The CCSs would be located as close as 250m from the Sandlings SPA/Leiston-Aldeburgh SSSI. No details are provided of the expected capacity and operational regime of plant at the CCSs, or vehicle movements to/from these sites. Based on the information provided, and in view of the proximity of CCSs to the SSSI/SPA, it is not clear that it can be concluded that “significant impacts are unlikely”, even with appropriate mitigation in place. Emissions from plant and equipment at this site can be mitigated by ensuring that NRMM conforms with Stage V controls (i.e. as set out in Annex II of regulation (EU) 2016/1628, as referred to in the outline Code of Construction Practice), and ensuring that any HGVs used at the site conform with Euro VI emission limits. It is requested that the potential impacts on the SPA/SSSI should be verified by the applicant (e.g. through the means of a screening model calculation). Again, this should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.

- 6.4. The outline approach to NRMM assessment has been agreed by the Council and our air quality consultant, and the Applicants and their air quality consultant. ESC also note that the clarification notes acknowledge that there will be further quantitative assessment submitted for examination during Deadline 3 and consider that additional mitigation measures are likely to be available should the assessment demonstrate that these are required.

- 6.5. *Trenching*: the description of emissions from construction plant during trenching shows that a small number of plant would be used for a limited period. This is unlikely to result in a significant impact at the Sandlings SPA/Leiston-Aldeburgh SSSI, provided effective mitigation is in place. Emissions from plant and equipment at this site can be effectively mitigated by ensuring that NRMM conforms with Stage V controls (i.e. as set out in Annex II of regulation (EU) 2016/1628, as referred to in the outline Code of Construction Practice), and ensuring that any HGVs used at the site conform with Euro VI emission limits, but it is not clear whether further measures would also be necessary. However, in view of the presence of this activity within the protected area, it is requested that the lack of significant impacts on the SPA/SSSI should be demonstrated by the Applicants (e.g. through the means of a screening model calculation). This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition, particularly as it has not been established that trends in vehicle emissions in the local area will match national projections.
- 6.6. As with the CCSs, the outline approach to NRMM assessment has been agreed by the Council and our air quality consultant, and the Applicants and their air quality consultant. ESC also note that the clarification notes acknowledge that there will be further quantitative assessment submitted for examination during Deadline 3 and consider that additional mitigation measures are likely to be available should the assessment demonstrate that these are required.

#### *Section 5 - Clarification of Discrepancies Between the Worst-Case Traffic Forecasts used in the Air Quality and Traffic and Transport Assessments*

- 6.7. The Applicants have satisfactorily explained why there is a discrepancy between traffic data used in the transport and air quality assessment. ESC welcomes this clarification.

#### *Section 6 – Assessment of Haul Road Traffic*

- 6.8. The Applicants have demonstrated that the additional light commercial vehicles and heavy goods vehicles along the haul routes impact upon local air quality can be identified as insignificant following Natural England's guidance (<http://publications.naturalengland.org.uk/publication/4720542048845824>). No further clarification is required.

*Section 7 – Assessment of Impacts Associated with Diverted Traffic*

- 6.9. The Applicants have demonstrated that the construction duration associated with a) widening the junction of the A1094 and B1069 (Works No.35) and b) reduced speed limit, signage and addition of rumble strips at the junction of the A12 and A1094 (Works No.36) is not of a sufficient duration to require an air quality assessment. This is acceptable based on the current information provided. SCC in association with ESC have however expressed concerns regarding the adequacy of the mitigation works proposed at the A12 and A1094 junction and this is the subject of ongoing discussions. The air quality impacts will need to be revisited in the event that the works proposed at this junction are revised.
- 6.10. The Applicants have highlighted that it is not possible to determine the duration of improvement works along the A12 at Marlesford bridge (Works No.37) at this point. However, the Applicants have made a commitment to consider air quality impacts within the Outline Construction Traffic Management Plan once detailed design information is available. This is considered acceptable.

## **7. Outline National Grid Substation Design Principles Statement (Doc Ref: ExA.AS-6.D1.V1 - EA1 and EA2)**

- 7.1. The Applicants have already provided an Outline Onshore Substation Design Principles Statement (APP-585) which relates to the EA1N and EA2 substations. The Council has provided comments on this document in the Local Impact Report (paragraphs 14.5-14.12). The Council had requested through the Statement of Common Ground process that the National Grid infrastructure either be included within the Outline Onshore Substation Design Principles Statement or a separate outline design principles document be provided. ESC therefore welcomes the submission of an Outline National Grid Design Principles Statement.
- 7.2. The Council understands that National Grid Electricity Systems Operator has offered grid connections to a number of projects (Nautilus and Eurolink Interconnectors and Five Estuaries Offshore Windfarm) which are anticipated in the future. The intention is for these projects to connect to the new National Grid substation at Friston proposed as part of the EA1N and EA2 proposals. That would result in the enlargement/extension of the National Grid substation. The Council is of the view that the National Grid substation should be designed to accommodate the anticipated grid connections from the outset to reflect its intended purpose as a strategic connection location. This is not only considered to be supported by the Guidance on Associated Development but also in relation to the criteria for good design set out in National Policy Statement EN-1. The policy statement places importance on good design and sustainability which includes the durability of developments.
- 7.3. Notwithstanding this position, the Council's comments in relation to the content of the document have been set out below.

### *Section 1 - Introduction*

- 7.4. The Council notes that paragraph 4 of the document sets out revisions to the wording of Requirement 12 of the draft Development Consent Orders (DCOs). The Council supports this wording which includes reference to the layout, scale and external appearance of the National Grid substation needing to accord with the Outline National Grid Substation Design Principles Statement, the current wording of Requirement 12 does not include this reference. The Council welcomes this update at Deadline 3 and the inclusion of the Outline National Grid Substation Design Principles Statement as a certified document within the draft DCOs.

## Section 2 - Design Principles

7.5. The Council has no comments on this section of the document.

## Section 3 – Outline Design Principles

7.6. The Council welcomes the commitment to continued engagement with Parish Councils, local residents and relevant authorities on design and landscape proposals and to provide the opportunity for the local community to provide feedback. The Council would like to see genuine engagement of the local community and key stakeholders within the design process and therefore although the above commitment is welcomed, the Council request that an outline of the engagement proposed is included within the document. This will provide greater clarity in relation to the nature of the post-consent engagement.

7.7. The Council supports the commitment that the landscape and building design proposals be subject to design review.

7.8. One of the principles in paragraph 9 states that *“Appropriate building design and materials will be sought as part of the procurement process. The visual impact of the National Grid substation will be sought to be minimised as far as possible by the use of design, building materials, shape, layout, coloration and finishes, as appropriate.”* Although supported, the Council considers that the outline design principles do not include a sufficiently clear commitment to reducing the overall size of the substation and height of the buildings and equipment during the design refinement process. This is considered of the utmost importance given the sensitivities of the receiving environment.

7.9. The Design and Access Statements (APP-580) set out in paragraph 33 that one of the key design considerations is the design of components. The document states that the majority of components are designed in more detail and procured post-consent and therefore the exact dimensions and appearance are unknown at this stage. Within the same paragraph it is stated that the Environmental Impact Assessment is *“undertaken based on assumptions made about the components based on a worst-case scenario to ensure that all potentially significant effects are reported”*. The Design and Access Statements go on to state, *“The general premise in the design and selection of components would be to minimise the potential impacts by reducing the size and scale of the components as far as practicable”* (APP-580, paragraph 34).

7.10. The substations are currently designed based on worst-case Rochdale envelope parameters. Although this is understood in relation to the EIA, the Council is concerned that this fails to achieve good design where the impacts of the

developments are minimised. The Council would like to ensure that the best practicable design is secured during the design refinement process post-consent, we should not be designing to the worst-case parameters. This is especially important given the sensitivities of the substations site. It is stated in the Design and Access Statement that the aim is to reduce the size and scale of the components as far as practicable. The Council requests that this same commitment is made within the Outline National Grid Design Principles Statement to strive to achieve good design.

- 7.11. The Council would also like to seek clarification as to whether the sealing end compounds which are proposed as part of the connection infrastructure would be subject to this design principles document.
- 7.12. ESC notes that SCC as Lead Local Flood Authority has advised that outfall to the Friston watercourse should only be utilised if infiltration is not possible or deemed in appropriate. The design principles assume discharge to the Main River in Friston.
- 7.13. The design principles as currently drafted do not give the Council sufficient confidence that the Applicants will seek to secure a substation design where every reasonable effort is made to reduce the overall footprint and height of the infrastructure.

#### *Section 4 – Finished Ground Level*

- 7.14. ESC accepts that the final finished ground level will be established at the detailed design stage post consent. An initial level must have however been identified for the National Grid substation in order to produce visualisations of the infrastructure and undertake visual impact assessments. It would therefore be useful to understand the finished ground level utilised in the assessments as this would define the upper limit.
- 7.15. The Applicants have also stated that in their response to ExQ1 - 1.0.21 that they have a *“Presumption of achieving the lowest practicable finished ground levels to minimise visual impact”*. It is considered that this should be included as a principle within the design principles document.

## **8. Land Use Clarification Note (Doc Ref: ExA.AS-11.D1.V1)**

- 8.1. The Council welcomes the clarification note which seeks to address concerns raised during the Statement of Common Ground process.
- 8.2. The Council requested clarification as to why the significance of the impact on permanent and temporary changes to land use was based on its regional level impact and not site level. The Council also sought clarification as to why the magnitude of effect resulting from the loss of permanent agricultural land was identified as low within the Environmental Statement and not as high in accordance with the definitions set out in Table 21.8 (Chapter 21). Section 2 of the clarification note sought to address these matters.
- 8.3. The Council also sought clarification in relation to the timings or pre-construction surveys which Section 3 of the clarification note seeks to address.

### *Section 2 – Impact Significance Methodology and Rationale*

- 8.4. The Council notes the Applicants reasoning for identifying the significance of the impact on permanent and temporary changes to land use in relation to the total available farmed resource in Suffolk. However, it is difficult to understand how any development, if impact significance is assessed on this scale, would result in anything greater than a minor adverse impact. This would appear contrary to National Policy Statement (NPS) EN-1 which states that *“Applicants should seek to minimise impacts on the best and most versatile agricultural land”*.
- 8.5. The Applicants amendment to the significance of the impact of permanent changes to land use during operation of the projects is welcomed. The Council agree with the revised conclusion that the projects would result in a major adverse impact at local level. Although the Council consider that the significance of the impact is more appropriately assessed at local level in order to deliver the aims of NPS EN-1, the Council understands that this will be a matter for the Examining Authority to determine.
- 8.6. It is noted that the Applicants have stated that this amendment will not materially affect the primary mitigation which will involve the Applicants entering into private landowner agreements. The Council would however like to highlight that one form of embedded mitigation would be to ensure that all reasonable measures have been taken to minimise the impact of the footprints of the onshore substations. This could be achieved through infrastructure consolidation, use of gas insulated equipment for the National Grid substation and also through ensuring that the footprints of the substations are minimised to the maximum reasonable extent. At present the Council

is of the view that not all reasonable measures to reduce the footprints of the substations have been explored.

*Section 3 – Programme for Pre-construction Land Surveys and Reinstatement*

- 8.7. The Applicants comments in this section are noted. The Council wanted to ensure that the pre-construction surveys are undertaken in advance of any other work on the land but understand that this will be secured through private landowner agreements. The Council also wanted to ensure that reinstatement of land is undertaken in a timely manner to reduce the duration of disruption to landowners. It is understood that matters of reinstatement will be considered post-consent once construction programmes are known. No further clarifications are sought in relation to these matters.



## 9. Archaeology and Cultural Heritage Clarification Note (Doc Ref: ExA.AS-10.D1.V1)

- 9.1. The Applicants have provided this clarification note in response to concerns raised by ESC and SCC regarding the adequacy of the assessment undertaken in relation to the historic landscape character. As this clarification crosses over between areas which are the responsibilities of both Councils, this response has been prepared jointly.
- 9.2. A Historic Landscape Assessment Report written by SCC Archaeological Service dated November 2019 was shared with the Applicants on 23 June 2020 and provides further detailed information in relation to this matter. This document was included in Appendix 1 of the Councils joint Local Impact Report. In addition to this information, the Councils also sent a document to the Applicants in July 2020 setting how we considered the historic landscape character should be assessed given its potential to be considered over a number of topic areas (a copy of this document has been included in Appendix 1 of this document). The Councils had also highlighted the need to assess the impacts of the projects on the historic landscape around Friston, historic and functional relationship between the village and common to the north and the historic boundary between Friston and Knodishall prior to the submission of the applications.
- 9.3. The Councils requested that a more holistic approach was taken with one document prepared looking at the historic landscape character and features considering the interplay between the different disciplines. The Councils therefore welcome the submission of this document. We have provided comments regarding the different sections of the clarification note below.

### *Section 2 - Setting of Heritage Assets (Built Heritage)*

- 9.4. The clarification note considers the contribution of the existing track to the setting of the Church of St Mary and to the setting of Little Moor Farm.
- 9.5. It is agreed that the track contributes positively to the significance of the Church, as a historic connection route between the Church and the historic common land and dispersed settlement to the north, and that it provides important views to the Church which enhance its prominence within the surrounding landscape. The clarification note also acknowledges that the obstruction of this track would therefore diminish the significance of the Church.
- 9.6. The clarification note states that *'The loss of this section of the historic trackway is therefore primarily responsible for the finding of an adverse impact of low magnitude on the significance of the church'* (para. 12). As previously noted, the Councils

consider that the adverse impact on the Church of St Mary is of a higher magnitude (medium), due to the detrimental impact on the rural character of the immediate setting of the Church, the erosion of its prominence in the landscape and the obstruction of its historic connections to the land and dispersed parts of the village to the north. The loss of the track is considered to be a part of this overall detrimental impact on the significance of the Church, as it would cause the destruction of a historic route to the Church and the loss of an important view from the north.

- 9.7. The Councils disagree with the assessment in the clarification note that the track does not contribute to the significance of Little Moor Farm (paragraph 15). We maintain that this historic connection between Little Moor Farm and the village core is a positive aspect of the listed building's historic setting. It reflects a link between the main village and the later settlement on the edges of Friston Moor and it is therefore considered to contribute to the understanding of Little Moor Farm as a greenside farmstead.
- 9.8. The loss of the track is however considered to be one element of the wider negative impact of the proposed development, i.e. the erosion of the agricultural setting of the listed building and the loss of its historic relationship to the village, as previously identified. The Councils therefore consider that the magnitude of the adverse impact on Little Moor Farm remains at medium.
- 9.9. The clarification note has sought to address the contribution the historic parish/Hundred boundary makes to the setting of Little Moor Farm and the Church. As set out above, there is professional disagreement in relation to some matters, but the Councils are satisfied that, notwithstanding this difference of professional opinion, this document provides sufficient information in terms of the significance of the feature to the settings of these assets. No further information is therefore requested.

### *Section 3 - Archaeology (Landscape) and Section 4 - Archaeology (Monument)*

- 9.10. In relation to below ground archaeology and direct physical impacts on the Hundred/parish boundary, the need to defer further field evaluation and mitigation to a post-consent stage of works is accepted.

### *Section 5 - Landscape Character*

#### The site

- 9.11. The clarification note provided by the Applicants is helpful in re-articulating that there will be *"large scale change to the local character of the LCT to the north of the village*

of Friston". Furthermore, the Applicants have clarified that in their view the new information provided in the Rapid Historic Landscape Assessment (RHLA) does not change either the landscape sensitivity or assessment conclusions. This is a matter of professional judgement, however what cannot reasonably be disputed is that the RHLA does clarify and articulate the historic landscape features present on the site, their relationships with each other, and their contribution to the understanding and setting of designated heritage assets, including Friston church and Little Moor Farm.

- 9.12. The trackway itself should be considered as having two layers of historical significance. Firstly, as a landscape feature of historical territorial land division. The second is its long-term use as a historical local route from the village to exploit resources of Friston moor, which over time became appropriated (enclosed) and farmed.
- 9.13. This trackway along the Hundred boundary is just one element of suite of related and legible historic landscape features in and around the site. These are discussed and mapped in detail, for this specific site, in '*Blything Hundred: A Study in the Development of Settlement*' [Peter Warner](#) 1982, (Appendix 2)
- 9.14. The proposals as submitted will not only erase one of these features but will also erase or obscure the legible relationships between these historic landscape features.

#### The wider landscape

- 9.15. The proposals as submitted, will therefore erase, or obscure, the relationship between and legibility of, characteristic landscape features of the [Ancient Estate Claylands Landscape Character Type](#) (LCT). The Applicants note that the site is on the boundary between this LCT and the [Estate Sandlands](#) LCT. In practice however, the site itself has the character of the Ancient Estate Claylands and should therefore be considered as such. (The LCT's are mapped to a scale of 1:50000 and guidance provided with the data is clear that judgement, especially in boundary areas, should be used in their application).
- 9.16. Further examples of these features in eastern Suffolk in the clayland landscapes, are set out by Peter Warner in [Origins: The Example Of Green-Side Settlement In East Suffolk](#) 1983 (pp42-44) and discussed more fully by the same author in; *Greens, Commons and Clayland Colonization: The Origins and Development of Green-side Settlement in East Suffolk – 1987*.
- 9.17. In summary, although the clarification note is very welcome, the extent and significance of harm to the site is still not considered to have been fully addressed. The assessment of the landscape impacts at present only goes down to the landscape

character type level as opposed to the site level. This could be addressed by defining the site and evaluating its sensitivity on the basis of the new information available. The extent/magnitude and significance of the harm could then be identified.

- 9.18. In order to assist this, a proposed definition of the site is mapped in Appendix 3. This is intended to encompass the footprint of the developments and the adjacent suite historic landscape features and assets. The Councils consider that this is an appropriate and reasonable approach, particularly in light of the new information about the site that has emerged during the development of the project and that such a request is consistent with the Guidelines for Landscape and Visual Impact Assessment 2013 (GLVIA3) (p70 para 5.1 and 5.2).

## **10. Socio-Economic and Tourism Clarification Note (Doc Ref: ExA.AS-17.D1.V1)**

- 10.1. The Council welcomes the submission of this clarification note which seeks to address the new information which has been submitted with the Sizewell C DCO application. Section 2 of the document relates to tourism accommodation and Section 3 relates to Construction Employment Cumulative Impact Assessment.
- 10.2. ESC notes the comments that SCC has made in relation to this document at Deadline 2.
- 10.3. The Council has not sought to review the Sizewell DCO documentation referred to in the clarification note given the short timeframe for comments and have therefore taken this information to be accurate.
- 10.4. The Applicants have stated that, having considered the cumulative impacts of EA1N and EA2 being constructed at the same time as Sizewell C there would be no overall negative impact on the available accommodation for non-home based workers or on the labour market itself. The rationale being that accommodation and labour market demand from the EA1N and EA2 projects is not significant enough to be a concern as it is highly unlikely that the 'worker peaks' for EA1N and EA2 will occur at the same time as that for Sizewell C. EA3 is also taken into consideration, as EA1N, EA2 and EA3 form the East Anglia Hub. It is suggested that the three projects will most likely be delivered sequentially, but even if they are delivered together, they will not peak at the same time as Sizewell C.
- 10.5. Based on the clarification note and information currently available to the Applicants, the Council accepts the conclusion that the updated Sizewell C information would not materially change the applications' conclusions.

## **11. Notice of Intent to Make Non-material or Material Changes (ExA.AS-1.D1.V1)**

### *Section 2 - Confirmed Non-material Changes*

11.1. ESC welcomes the proposed non-material changes to the parameters of the wind turbines and also the reduction in the Order Limits and Works boundaries which seek to lessen the disruption to land use activities, residential properties and facilitate the removal of residential titles.

- Reduction in maximum wind turbine tip height
- Increase in minimum wind turbine draft height
- Reduction of Order Limits at Work No.7
- Reduction of Order Limits at Work No.43 (East of Grove Road)
- Reduction of Order Limits at Work No.s 33 and 43 (West of Grove Road)
- Reduction of Order Limits at Work No. 43 (Moor Farm)
- Reduction of Order Limits at Work No.36 (A1094)
- Reduction of Work No.33 Boundary
- Reduction of Work No.34 Boundary
- Reduction of Work No.43 Boundary

### *Section 3 – Proposed Non-material Changes which Increase Order Limits*

11.2. ESC notes the non-material changes proposed which result in an increase in the Order Limits:

- Expansion of Order Limits at Work No.7
- Expansion of Order Limits at Work No. 15
- Expansion of Order Limits at Work No.33 (High House Farm)
- Expansion of Order Limits at Work No.33 (Woodside Barn Cottages)

### *Section 4 – Non-material Changes Under Consideration*

11.3. ESC will await details of further non-material changes proposed by the Applicants at Deadline 3. We would however welcome refinements to the boundary of Works in the area of the onshore substations site to accommodate early landscaping works and design refinements which reduce the environmental impacts of the projects.

## **12. Application for the Inclusion of Additional Land (ExA.AS-18.D1.V1 – EA1N and EA2)**

- 12.1. ESC notes the non-material changes proposed which result in an increase in the Order Limits:
- Expansion of Order Limits at Work No.7 (Land Plots No.8 and 8A)
  - Expansion of Order Limits at Work No.15 (Land Plot No.31)
  - Expansion of Order Limits at Work No.33 (High House Farm) (Land Plot No.130)
  - Expansion of Order Limits at Work No.33 (Woodside Barn Cottages) (Land Plots No.104, 104A, 104B, 104C)
- 12.2. ESC understands the reasons provided in the document as to why each of the Order Limit amendments are necessary and recognises the Applicants position that the amendments would not change any of the conclusions in the Environmental Statements. ESC would however like to provide any further comments in relation to this matter at Deadline 3.

## **Appendix 1 – Document sent to the Applicants 8 July 2020 from ESC and SCC.**

### **1. How to Tackle the Historic Landscape Character**

- 1.1. The Councils recently provided SPR with a Historic Landscape Assessment Report written by SCC Archaeological Service dated November 2019. It is understood that SPR are currently reviewing this document and will look to provide a response. The report highlighted that the extant historic landscape features, of local and regional importance, which would be affected by the EA1N and EA2 developments include:
  - The permanent destruction of a track which is a landscape feature marking part of an Anglo-Saxon Hundred boundary and historic parish boundary. This is locally and regionally significant.
  - Permanent destruction of locally significant historic field boundaries.
  - Damage to the setting of a regionally and potentially nationally significant moated site and associated land.
  - Impact on the character and spatial significance of the dispersed settlement pattern and breakup of the physical and visual connectivity with Friston Church, as well as across the landscape as a whole.
- 1.2. The Councils recognise that the historic landscape features identified above cross over a number of different topic areas covered by different chapters within the Environmental Statements (ES) submitted with the applications (Archaeology, Built Heritage, Landscape and Visual Impact Assessment (LVIA) and Public Rights of Way (PRoW)).
- 1.3. Looking specifically at the track as one feature identified above, the importance of the trackway is multifaceted, it is a hundred and parish boundary, forms part of a system of features related to the moor and moorside settlements, contributes to the setting of the church and Little Moor Farm and provides significant amenity value as a PRoW. This feature would therefore be considered differently within each chapter of the ES.
- 1.4. From a built heritage perspective, the Councils are of the view that it would be best to address the track as a feature which contributes to the setting of the Grade II\* listed church, contributing to the legibility of the historic landscape and how the church was connected to and experienced from the historic common land to the north of the village. The track also reflects an historic functional relationship between Little Moor Farm and the trackway which links the main village to the later settlement on the edges of Friston Moor. For this reason, the trackway is considered to contribute to the understanding of Little Moor Farm as a green farmstead (Peter Warner (1987) Greens, Commons and Claylands Colonisation). There is also a potential that Little



Moor Farm was the site of a parsonage with tracks linking it to the churches, as detailed in the report (pages 18-20).

- 1.5. From an archaeological perspective, the track is clearly a Non-Designated Heritage Asset (NDHA) as a route and a feature. The Councils consider the track feature should be included as part of the baseline, which is referenced as missing within report (paragraph 7.2). The track forms part of a long-standing, significant element of the landscape which can be traced beyond the site is a strong point, and the report also notes that nationally we don't have a picture of the survival and form of hundred boundaries which should also be acknowledged as an additional consideration to existing baseline data.
- 1.6. In terms of assessment/impact and mitigation on its physical form as a monument present within the site, it has what would be assessed as 'evidential value' with potential (once investigated) to see if it has a clearer form, and also for associated activity (e.g. burials at locations on boundaries, including 'deviant' burials).
- 1.7. From a LVIA perspective, Guidelines for Landscape and Visual Assessment (GLVIA3) makes it clear that the relationship between landscape and historic landscape matters is a close one. One complements the other. Landscape history, its historic character, the interaction between people and places through time, and the surviving features and their setting may be relevant to the LVIA baseline, and historic landscape characterisation and current landscape character assessment should both form part of the evaluation. There is an expectation that good use should be made of existing historic landscape information, and this information is currently available for use in this LVIA.
- 1.8. There is an expectation that SPR should incorporate the SCC Friston and Knodishall Historic Landscape Assessment into the baseline for the overall LVIA for the substation and cable corridor development proposals. Without such incorporation, the LVIA cannot be considered complete. The historic landscape features identified could then have implications for the sensitivity identified for the site.
- 1.9. Finally, from a PRoW perspective the Anglo Saxon Hundred boundary and historic parish boundary is a PRoW which has significant amenity value resulting from its presence and its local, historical and cultural importance as a right of way.
- 1.10. It is clear taking the example of the trackway that in each of the different topic areas this feature would need to be addressed in a different manner. The Councils are concerned that even if all the historic landscape features are identified in this manner, this may still result in the historic landscape as a whole not being adequately

captured. It is considered that a more holistic approach should be utilised with one document looking at the historic landscape character and features taking into account the interplay between the different disciplines. For example, disaggregating the assessment of the trackway as set out above could result in the assessments missing the important of this feature as part of a wider network of features.

- 1.11. Although conversations are occurring within the various Statements of Common Ground regarding the topic of the historic landscape character it is considered that it would be beneficial to bring these discussions together in one place and address the issue holistically.
- 1.12. Notwithstanding the fact that the Councils consider that insufficient assessment has been undertaken of the historic landscape character it is recognised that by virtue of this development, the extant historic features identified above will be lost. The Councils would therefore welcome the opportunity to discuss potential measures which could be undertaken in terms of compensating for the impacts.
- 1.13. The Councils consider as part of the s111 agreement there is the potential for the funding provided for heritage to be utilised to provide information boards and displays to assist in understanding of the historic landscape character and features. Information could be provided to detail the evolution of the area through time.
- 1.14. The Councils also consider there is an opportunity to involve the community in the archaeological investigations. For instance, SPR could commit to involving the local community in the post consent investigations into the historic track.

**Appendix 2 – Pages from 'Blything Hundred: A Study in the Development of Settlement'**  
**[Peter Warner](#) 1982**

### 3. The Development of Dependent Tenements

The Class I tenements, described in the previous section, where the farmstead was sited on the inside edge of an estate boundary with its lands lying partly within the boundary of the old estate and partly outside it, were also probably the oldest. They usually survive as the more substantial moated green-side farms, having been amalgamated from several minor tenements, the greens and commons which they once overlooked having long since been enclosed without written record. However, examples can still be seen where the greens and commons remain intact, and early maps can be used to obtain some idea of the way the land lying behind the farm has been consolidated from an earlier strip-field system within the boundary of an earlier estate. In just one or two examples it is possible to see how intakes from the waste and commons, lying well outside the estate boundary, have been added to the tenement in lieu of common rights. New tenements were then established on the new intakes to form a second order of green-side settlement. This leap-frog process of enclosure naturally gives rise to a very dispersed settlement pattern.

Figure 59 illustrates Friston Moor Farm as it appears on a survey by Kirby, dated 1781.<sup>1</sup> The fields lying south of the farmstead have been consolidated from an open field system, part of an area of arable land centred on Friston Church. The strip fields are clearly indicated not only in the shape of the enclosures themselves but also in the submerged boundaries shown on the plan of the farm, which reveals that one furlong, divided between two enclosures, was copyhold of the manor of Snape (Fig.59). That this farm was consolidated from several different green-side tenements, all holding land side-by-side on the edge of Friston Moor, is evident from the deserted moat, the curious deviation of the Leiston parish boundary on the east of the farm, and the strange shape of 'Barrow Pightle', the 'retting pit' of which was probably made out of the remains of another deserted moat on the west side of the farm.<sup>2</sup>

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1. I.R.O., HA15/B11/1.

2. The moat and indentation of the Leiston parish boundary is not marked on Kirby's map of 1781, only the hedgerow which forms the boundary. The moat is clearly visible on the 1958 revision of the six inch O.S. map. A double-dweller cottage stood in the middle of the site until recently.

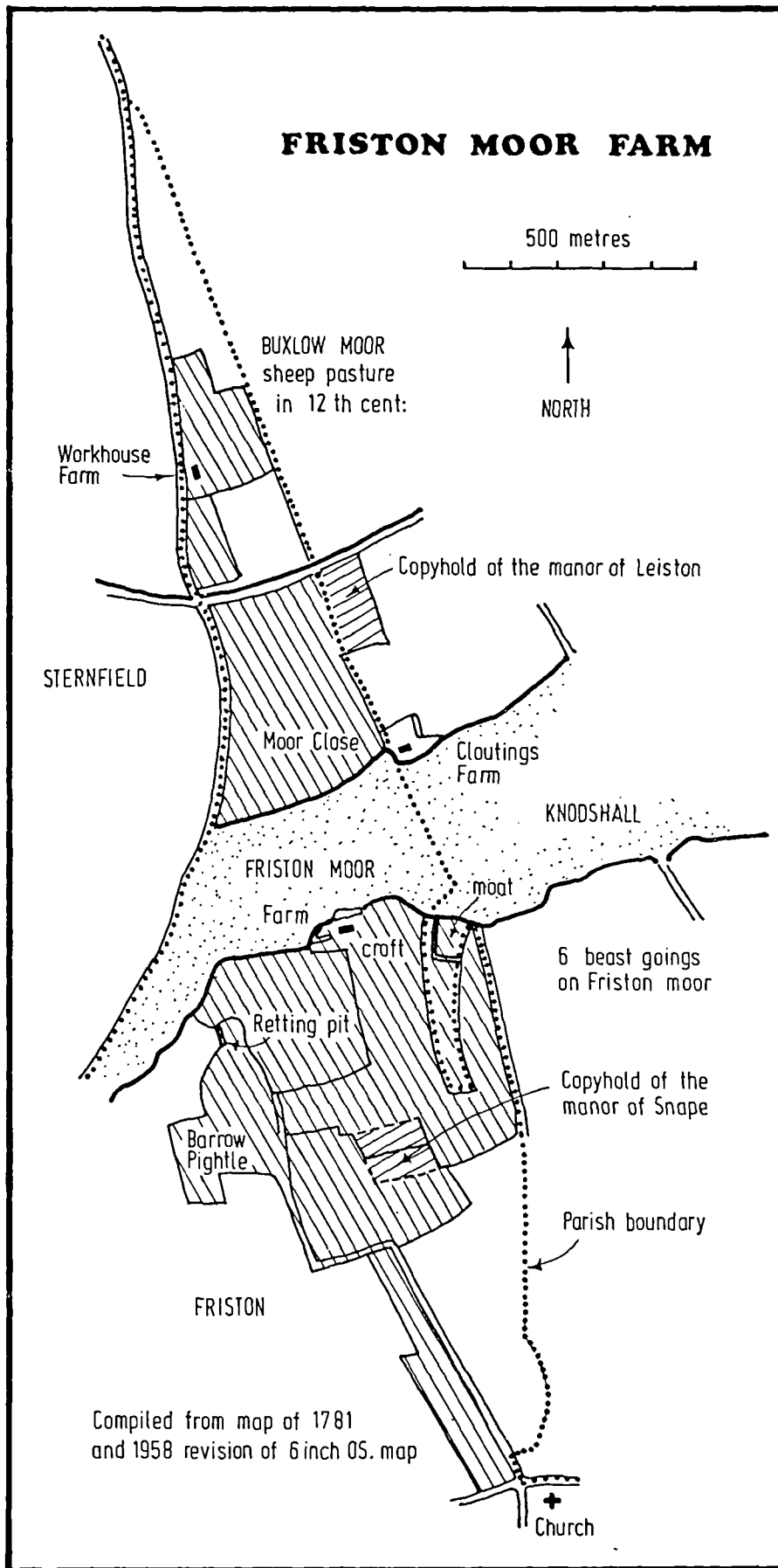


Figure 59.

On the edge of the moor the bulging croft boundary around the farmstead was probably an encroachment onto the moor, perhaps made to take in a pond situated in front of the tenement. Over the moor itself, the plan tells us that the tenement held six beast-goings. Most green-side tenements (like the one already illustrated at Hor's Farm Wissett)<sup>3</sup> possessed only two beast-goings; the six here may represent two belonging to the original tenement plus four acquired with the two engrossed tenements either side of the farm. On the opposite side of the Moor the farm held some detached closes, which were in origin intakes from the moorland. These were but a segment of a much larger area of the moor, which, to judge from the curving boundaries in this area, had probably been made from the direction of Sternfield parish. This segment is included in a long pointed projection in the north of Friston parish, and probably represents Friston's share of this large moorland area. A single close belonging to Moor Farm lay on the other side of the Friston-Leiston parish boundary and was copyhold of the manor of Leiston. There is no evidence of settlement on the edge of the 'Moor Close', but in the post medieval period a farmstead, called 'Clouting's Farm'(Fig.59), stood on the adjoining share of the moorland enclosure.

The 'Moor Close' was probably created out of a large area of moorland, which once extended into Knodishall, Buxlow and Leiston. In 1307, a dispute arose concerning the grazing rights for sheep over Buxlow Moor, between Henry Betring and the Abbot of Leiston, who may have been pressing for possession at that time.<sup>4</sup> A very similar intake from the waste can be seen in the middle of Sotherton Moor where a series of curving boundaries on the east, or Henham side, appears to be centred on the deserted hamlet of 'Middleton'.<sup>5</sup> Some large intakes on the north side of Valley Farm in Henham, between Sotherton Moor and Henham Common, had the name of 'Great and Little Breachers' in the nineteenth century, suggesting that they were in origin temporary clearances.<sup>6</sup> The

3. Fig.57b.

4. Copinger S.MSS. sub. Buxlow. (Bodleian Suffolk Charters. 1170 4. Edw.II) Grant by Richard de Elmedene...to Henry Bettrynge for five years of a pasture called 'le mor' in Buxlow. & Commission on complaint of Henry Bytringg that John, Abbot of Leiston, and others drove away 80 sheep from the common pasture at Buxlow and assaulted him.

5. See Figure 4. TM.43807760. (Henham site 3); I.R.O., HAll/C9/26 'Middleton Woods'; Suckling Vol.II p.356.

6. 'Breaker Hill', a 'breck' field name, which may be part of this intake, can be found on six inch O.S. maps on the edge of Henham Park. (See Fig.7). See also I.R.O., HAll/C9/26 survey of Henham Estate by William Peak (early 19th cent.) & HAll/C9/74.(31-32) plans of Valley Farm, which show 'Stetch Walk' in the area of what is now called Dunwich Wood.

'Moor Close' to the north of Friston Moor Farm may likewise have its origin in an area of periodic breckland type agriculture.<sup>7</sup> The presence of Friston church at the apex of Friston Moor Farm's consolidated landholding suggests that these one-time strip-fields formed part of a much larger land unit, with farms like Moor Farm established as dependent tenements on its periphery. Possibly there was once a manor site nearer the church pre-dating Friston Hall, in which case it is now covered by modern developments.

That such large green-side farms were once dependent tenements formed on the edge of ancient estates is well illustrated in the example of Rookery Farm, Chippenhall (Fig.60). This farm survives as part of a green entry complex consolidated around the western gate of Chippenhall Green. Like Friston Moor Farm it, too, was formed out of several deserted green-side tenements engrossed in the late medieval period. Today the farm holds eight beast-goings plus one for the maintenance of the gate. Small deserted medieval sites, some of which may have been abandoned at an early date, have been found on three sides of Chippenhall Green.<sup>8</sup> The farm as it stands today is very typical of the larger, part-moated, green-side tenements which abound on the Suffolk claylands. Also, like Friston Moor Farm, the bulk of its fields lie behind the farm running back from the green. Although there is no evidence in this case that they were consolidated from a strip-field system, it seems likely that the landholding of Rookery Farm formed part of a much larger land unit of the 'hall farm estate' type just as the deserted tenements and surviving farms on the west side of Chippenhall Green held land within the ancient boundary of the Chippenhall Hall estate (Fig.60).<sup>9</sup> But in the case of Rookery Farm the hall farm or nucleus of the old estate, which lay just outside the southern corner of the farm, (Fig.60) became deserted in the early medieval period.

A small detached part of the farmland together with a small cottage lay on the opposite side of Chippenhall Green, being part of an intake from the

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7. The eighteenth century plan of 'Moor Farm' Sotherton (now called Sotherton Hall) is similar to Friston Moor Farm, having detached pieces of land one of which probably lay in the area of the Middleton 'breckland' intake. See I.R.O., Hall/C9/36.
  8. TM.28607580 (Fressingfield site 14). (N.B. sites 14 & 15 produced only TM.28407570 (Fressingfield site 15). very small quantities of early TM.285757 (Fressingfield site 19). medieval pottery).  
TM.28957585 (Fressingfield site 4).
  9. See Chapter VI Sec.5 note 5.

Appendix 3 – Suggested definition of the Friston site.

