

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 3 - 15 December 2020

**Issue Specific Hearing 2 –
Onshore Siting, Design and Construction – Summary of SCC Oral Case**

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Examining Authority's Question		Suffolk County Council's Response	References
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings 2			
Agenda Item 2 – Context and Update In the light of the time that has elapsed since the acceptance of the two applications for examination, the Applicant and other IPs are invited to provide an update on the information provided to the ExA on external changes which have occurred since the submission of the applications and their relationship and effect, if any, on the projects, including but not limited to: Hornsea P3, Norfolk Vanguard and Norfolk Boreas			
a) Recent decisions by the SoS BEIS on energy proposals in the Eastern and South Eastern regions		<p>Delays in decision making have the potential to increase the likelihood that construction timeframes of the consented projects overlap with EA1N and EA2. The overlapping of the construction periods could result in decreased economic benefits and potentially increased cumulative traffic impacts from port related traffic.</p> <p>Hornsea Project 3 – Minded to Approve (1 July 2020) Final decision due 31.12.2020. Hornsea P3 identified a construction year of 2021 onwards so the delay in consenting the project could increase the potential of a construction overlap.</p> <p>However, SCC agrees that the delay in the Secretary of State's decision on the Hornsea P3 OWF, even if this resulted in the construction programmes overlapping, is unlikely to result in significant cumulative impacts with the current projects as a result of where they are geographically located and the unlikelihood that the projects would utilise the same port as EA1N and EA2.</p>	

		<p>Norfolk Vanguard – Consented 1 July 2020. SCC identified for information purposes only that there is a current application for judicial review of that decision but the decision remains valid unless or until the Court otherwise orders.</p> <p>Norfolk Boreas – ExA report expected 12 January 2021</p> <p>Although there have been some delays to these other projects, EA1N and EA2 projects have also suffered delays. The projects collectively provide a pipeline of construction work. By working together with the Applicants, SCC is of the view that through the MoU they can ensure that the positive cumulative socio-economic effects of the projects are maximised.</p> <p>However, port related traffic has not been considered within the ESs as the Applicants have not specified which port they will utilise. There is a Requirement within the draft DCOs which seeks a Port Travel Plan (Req. 36) but this will only consider the traffic for EA1N and EA2 alone and not cumulatively with other projects. The cumulative impacts from port related traffic therefore is unknown. SCC is discussing this issue further with the Applicants.</p> <p>There are similar issues with construction traffic more generally and SCC is discussing this further with the Applicants.</p>	
b) The acceptance of examination of proposals for Sizewell C, and the		<p>Sizewell C</p> <p>The Applicants provided the following updates (relevant to</p>	

<p>implications of this and any further progress in the decommissioning of Sizewell A and changes to Sizewell B</p>		<p>SCC's concerns) to the CIAs with Sizewell C at Deadlines 1 and 2:</p> <ul style="list-style-type: none"> • Traffic and Transport SZC CIA • Socio-Economic SZC CIA <p>SCC also noted the Applicants' intention to provide further information on traffic and transport cumulative effects with SZC at Deadline 3 and reserved its position until it had reviewed that further information.</p> <p>SCC made the following points based on the currently available information.</p> <p>Traffic and transport – SCC as the Local Highway Authority continues to have concerns as regards the sequencing of works for Sizewell C and for the Applications, in particular the accommodation works for Abnormal Indivisible Loads at Marlesford Bridge on the A12. This issue needs to be adequately addressed by the Construction Traffic Management Plan (under Req 28), and SCC continues to discuss this matter with the Applicants.</p> <p>The Applicants provided a Socio-Economic and Tourism Clarification Note (SZC CIA) (ExA.AS-17.D1.V1) at Deadline 1. Based on the clarification note and information currently available to the Applicants, SCC accepts the conclusion that the updated Sizewell C information would not materially change the applications' conclusions. EDF Energy are proposing a full suite of proposals to mitigate their own requirements including a detailed skills and employment strategy, a Housing Fund, and a campus for 2400 workers.</p>	<p>See SCC comments at D2 to the Applicants' response to ExQs 1.4.19, 1.18.19, and 1.18.20.</p>
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The Applicants are proposing a continuation of their Memorandum of Understanding in relation to skills and employment requirements.

Sizewell B

Sizewell B is an operating nuclear power station and therefore there are traffic movements associated with the operation of the station. This traffic has been included in the baseline.

In addition, every 18 months Sizewell B has a planned outage where refueling and other jobs take place, at these times which can last from 6–12 weeks, the workforce increases by approximately 1000 people, bringing revenue into the locality and boosting annual spend. However, it also brings additional traffic to the area and requires bed spaces, often in the tourism sector, for the additional workers – the majority of who will be transient.

SCC HA agreed that that the Sizewell B outages did not need to be subject to a sensitivity test and should be managed through the Construction Traffic Management Plan (CTMP) secured through Req 28.

Sizewell A

Sizewell A ceased generating on 31 December 2006. The site has now, in line with government policy, entered into a period of decommissioning.

<p>c) Crown Estate licensing agreements in respect of proposed offshore windfarms including Five Estuaries and North Falls</p>	<div data-bbox="750 231 1639 456"> <p style="text-align: center;">ISH2: Action No. 7</p> <p style="text-align: center;">Summary Table of Projects for Cumulative Impact Assessment</p> <p>No Change to the list of projects previously identified by SCC in the LIR and its responses to ExQ1s.</p> </div> <p>The Agreements for Lease between North Falls (Greater Gabbard Extension) Offshore Wind Farm (NFOWF) and The Crown Estate was signed in summer 2020. NFOWF aim to sign a connection agreement with National Grid in 2021. The final stages of the feasibility consenting activity is anticipated to commence in January 2021. EN010119-Advice-00001-1-201106 North Falls Inception Meeting Note FINAL.docx.pdf (planninginspectorate.gov.uk)</p> <p>The Agreement for Lease between Five Estuaries (Galloper Extension) and The Crown Estate has also been signed since the submission of the applications. Seabed rights awarded for offshore wind extension projects The Crown Estate</p> <p>National Grid's TEC register identifies that Five Estuaries has a connection offer and this was stated to be at Friston should the National Grid substation, the subject of the current EA1N and EA2 DCOs, be consented. Connection registers, reports, and guidance National Grid ESO</p> <p>There is limited information available in the public domain regarding this project, but SCC considers that National Grid</p>	<p>See SCC's response to ExQ1 1.0.18, 1.14.5, and 1.14.6 at Deadline 1</p>
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could provide details of the land take required to connect a 353MW capacity offshore wind project to the National Grid substation.


SCC maintains that as the National Grid substation is being considered as a strategic connection point for multiple projects, the effects of these connections on the design of the National Grid substation and associated impacts should be fully considered.

SCC stated that it did not consider the Applicants' current approach to CIA to be tenable. SCC submitted that the assessment of good design required a strategic approach to be taken, which was both 'top down' as regards the strategic choices and 'bottom up' as regards the design choices, because strategic decisions which effectively set the parameters for the available design solutions needed to be informed by an adequate assessment of what can be expected to happen over the lifetime of the development and not just the short term.

A good design needs to be flexible and adaptable, taking into account what is realistically known at the time the design is formulated. SCC submitted that it was already known from the material in the public domain that Friston as a location would likely be the focus as a connection point to the NG network for other proposals as well as the Applications. SCC referred to the connection offer for the Nautilus Interconnector project (also relevant to item (d)), and the connection offer to Five Estuaries OWF, and to the NFOWF where a connection offer is expected shortly.

		<p>SCC submitted that the Applicant needed to engage with that wider picture in order to show that the site location at Friston for the substation infrastructure is an appropriate and sustainable choice, with the capacity and the flexibility to accommodate those future changes. SCC specifically referring to the choice of technology (Air Insulated Switchgear or Gas Insulated Switchgear), which had different spatial implications, essentially AIS needing more land take but GIS needing larger/taller buildings, and the choice between them had consequences across disciplines, including landscape, rights of way, drainage, and design. SCC submitted that the Applicants' CIA therefore needed to include how those two technologies would translate to NG substation requirements, if the other projects were to connect to the NG network at Friston.</p> <p>SCC also submitted that it was insufficient to see this issue merely through a legalistic prism of meeting EIA or HRA requirements for CIA or in combination assessment, because the need for good design and the need for good planning was a wider concept. SCC referred to para 127(a) of the NPPF which required developments to function well not just for the short term but over the lifetime of the development.</p>	
d) National Grid structure, policy and plans in the local area, including their strategic function and future plans for the proposed substation and Grid connection site and the potential impact of Sizewell C.		<p>National Grid Structure and Policy and Plans</p> <p>SCC is aware that connection offers have been given to Nautilus Interconnector, Eurolink Interconnector and Five Estuaries Offshore Wind Farm. SCC maintains that as the National Grid substation proposed by EA1N and EA2 is being considered as a strategic connection point for multiple</p>	

		<p>projects, the effects of these connections on the design of the National Grid substation and associated impacts should be fully considered.</p>	
<p>e) Developments in energy policy, including the National Grid ESO Offshore Coordination Project and the BEIS Offshore Transmission Network Review, including whether the development of any 'offshore ring main' (ORM) or other alternative connection development projects which it has been argued might serve the proposed developments are now or might in relevant timescales become serious possibilities to which the Applicant and the SoS might reasonably have regard.</p>		<p>Although these National Policy Statements (EN-1, EN-3, EN-5) predate the recent change to Net Zero by 2050, whilst it would be preferable for these to be reviewed and updated as soon as possible, SCC accept that these comprise the current policy framework.</p> <p>SCC submitted that, acknowledging that policy framework, it remained possible to take account of the 'direction of travel' of emerging policy and guidance, including the BEIS Offshore Transmission Network Review, through the relative weight that was given to different aspects of current policy. SCC highlighted, as an example, the references in EN-1 paras 4.5.1 and 4.5.3 to functionality and fitness for purpose and to proposals being durable and adaptable when considering design, as commanding greater weight as relevant considerations, given the clear direction of travel seeking greater co-ordination between projects.</p>	<p>Increasing the level of coordination in offshore electricity infrastructure (publishing.service.gov.uk)</p>
<p>The ExAs will invite submissions from invited IPs and Other Persons who wish to raise matters in relation to this item.</p> <p>The Applicant will be provided</p>			

with a right of reply. This item will draw on responses to the ExA's First Written			
Questions [PD-018], including but not limited to 1.0.17-1.0.18, 1.14.1 to 1.14.3, and 1.14.5 to 1.14.6.			
Agenda Item 3 – Strategic Siting - Approach The ExAs will ask the Applicant to present the approaches taken to each project's onshore components, with respect to:			
a) The choice to make a new onshore connection, as opposed to utilising/expanding existing connections at Bawdsey or creating new connections elsewhere.		<p>SCC made no submissions on item 3(a).</p> <p>SCC are satisfied with the explanation National Grid provided in a letter to SCC as to why the connection offer in the Leiston area was provided. SCC also understand that the EA1/EA3 Bawdsey to Bramford corridor no longer had capacity to accommodate further cables following amendments to the EA1 scheme during the Contract for Difference process.</p>	 ESO NGET response to Suffolk County Council
b) The specific need for, and justification of, locations of landfall at Thorpeness and substations/transmission systems connections,		<p>Landfall Location</p> <p>SCC made no submissions on the landfall location.</p> <p>SCC accepts the landfall location which has been chosen for</p>	

<p>including the proposed National Grid substation and connections to the grid at land north of Friston. To include details of the strategic decision-making process for the proposed locations and their generation capacities – why were the sites chosen, and in what order?</p>		<p>the projects. It is a positive that both projects will be accommodated in the same location, and the commitment should the projects construct sequentially that the first project will lay the ducting for the second project at the same time is welcomed.</p> <p>Substations/Transmission System Connections</p> <p>SCC referred to its engagement with the Applicants during the pre-application consultation stages and indicated that it would not have chosen the Friston location but acknowledged that it was for the Applicant to make that decision and provide justification for it. SCC referred to its preference for the Broom Covert location due to the ability to consolidate with existing energy infrastructure, together with its assessment of the full range of relevant considerations.</p> <p>SCC also made the point that the suggestion from the local authorities during the pre-application consultation that the Applicants should extend the substation area of search to west of Aldburgh Road was not made on the basis that sites within or closer to the AONB were necessarily to be ruled out, but that a wider search would ensure a thorough assessment of what viable options might exist. SCC referred to its response to the Pre Phase 1 and Phase 1 consultation (as summarised at pp.2-3 of Appendix 5.14 of APP-034).</p> <p>With regard to the Applicants' choice of Friston, SCC was concerned to now ensure that the chosen site and its extent:</p> <ol style="list-style-type: none"> 1. works both now and for the longer term; 	
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		<p>2. has been assessed looking at the full range of impacts, particularly cumulative effects;</p> <p>3. mitigates its impacts as best as can be achieved.</p>	
c) Justification for the proposed cable alignments – was this as a result of the chosen landfall and substation locations? What rationale was used in the decision-making process of routes or ways to link up the chosen locations?		SCC made no submissions on item 3(c).	
<p>The presentation should include details on the reasons for changed strategies in relation to landfall and grid connection locations and how these were evaluated; evaluation criteria in assessing alternative substation locations and their potential for mitigation; and strategic justification of the Rochdale envelope and land required for the development north of Friston.</p> <p>The ExAs will invite submissions from invited IPs and Other</p>			

<p>Persons who wish to raise matters in relation to this item.</p> <p>The Applicant will be provided with a right of reply.</p> <p>This item will draw on responses to the ExA's First Written Questions [PD-018], including but not limited to 1.0.17-1.0.19, 1.14.1 to 1.14.3, and 1.14.5 to 1.14.</p>		
<p>Agenda Item 4 – Local Siting – Impacts and Mitigation</p> <p>The ExAs will wish to explore the following matters relevant to onshore siting and design with the Applicant including, but not limited to:</p>		
<p>a) Design and impact of the proposed landfall and cable alignments on:</p> <ul style="list-style-type: none"> the Suffolk Coast AoNB, Heritage Assets Public Rights of Way (PRoW) and local landscape implications. 		<p>SCC drew attention to the concerns already expressed in the LIR on the approach taken by the Applicants to the assessment of effects on PRoWs, and made the point that it did not consider that the Applicants' PRoW Clarification Note had resolved those concerns (as indicated in section 6 of REP2-035).</p>
<p>b) Design and impact of the proposed substations/transmission systems connections, including the proposed National Grid substation and connections to the grid, specifically in terms of:</p>		<p>Overarching design matters</p> <p>EA1N and EA2 Substations</p> <p>SCC's concerns on strategic design matters and cumulative effects (as rehearsed under Agenda items 2 and 3 above) carry across to Item 3(b).</p>

<ul style="list-style-type: none"> • Overarching siting and design issues • Landscape and Visual Impact, including upon PRowS • Historic Environment • Achieving good design 		<p>SCC submitted that it was important that the principles and parameters relevant to design were considered during the Examinations and that key matters with significant design implications were not deferred to the post-consent stage.</p> <p>Whilst the Applicants contended that there were difficulties in providing sufficient information on a range of design matters before they had engaged with their supply chain, SCC made the points that (i) the EIA of the projects does need to engage with the impacts of the proposals, which entails a degree of specificity, even allowing for the use of the 'Rochdale' envelope, and (ii) it is not unusual for the consent stage of DCO projects to occur before construction contracts were in place and NSIP promoters frequently dealt with that by producing a 'reference design' for the proposals which could be examined and tested at the Examination, and that could set parameters to then inform requirements.</p> <p>SCC welcomed the reductions in footprint for the substations put forward in the Project Update and prospectively welcomed the potential reductions in heights and levels referred to by the Applicants at ISH2 but reserved its position until it had seen the detail. SCC also welcomed the provision of the Outline Onshore NG Substation Design Principles.</p> <p>However, SCC submitted that these design adjustments did not address the bigger picture, in terms of ensuring an adaptable design that was fit for purpose over the longer term, having regard to the potential expansion of the NG substation in the light of the known reasonably foreseeable projects of others.</p>	
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		<p>SCC saw this as a fundamental element of good design and therefore a matter to be grappled with at this stage.</p> <p>SCC referred to the report it submitted at D2 (REP2-037) from AFRY on substation requirements, and the different implications of AIS and GIS technology for the NG substation. SCC indicated that if the Applications were considered in isolation it was leaning towards GIS as having more benefits than disbenefits, but that was subject to the caveat that there needed to be a full assessment of the implications of the other projects that may connect at Friston, and how they fit in to the jigsaw, before coming to a concluded view on the balance of advantage between the two technologies.</p>	
<p>The above discussions will include but not be limited to the following issues: evaluation of the proposed cable alignments and effect on relevant interests, including in relation to corridor widths; preferred substation layouts and their impact on mitigation measures; evaluation of technologies and other effects in relation to the proposed substations and how these affect design; how 'good design' including design excellence and sustainability in respect of the projects as a whole and the substations in particular will be</p>		<p>SCC Floods comments</p> <p>SCC made specific reference to its concerns about the adequacy of the sizing of the SuDS infiltration basins, as described in the SuDS Infiltration Clarification Note (REP2-012) and the details of those concerns are now addressed by SCC in its separate D3 submission in response to ISH2 Action No. 28 on Drainage and Flood Risk.</p>	

<p>addressed, implemented and monitored; effect on the setting and significance of heritage assets and the relevance of any mitigation; the effect on any designated PRowS and; the effectiveness of proposed mitigation measures and whether further mitigation can be implemented with regard to (but not limited to) – visual effects, environmental effects, public rights of way, the setting of heritage assets. The discussions will consider relevant policy and the tests therein.</p> <p>Following on from Agenda Item 2, the ExA may wish to draw upon any issues that have arisen during the ISH to also examine any cumulative impacts, including timetables for development and the potential for overlap and possible wider impacts arising from the proposed substations and grid connection site. The ExAs will invite submissions from invited IPs and Other Persons who wish to raise matters in relation to this item. The Applicants will each be</p>		
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<p>provided with a right of reply.</p> <p>This item will draw on responses to the ExA's First Written Questions [PD-018], including but not limited to 1.0.1 to 1.0.16, 1.0.21, 1.8.1 to 1.8.14, 1.10.1 to 1.10.6, 1.10.8 to 1.10.16, 1.10.18, 1.10.22, and 1.10.25 to 1.10.26</p>		
Agenda Item 5 – Possible Scope for Changes to the DCO Applications		
<p>The ExAs will review the matters emerging from Agenda Items 2 to 4 above and will ask whether there is any possible need for changes to the DCO Applications before them to accommodate any of these. If there are, the possible scope, timing and process applicable to any such changes will be explored.</p> <p>The ExAs will ask for the Applicants' submissions.</p> <p>The ExAs will invite submissions from invited IPs and Other Persons who wish to raise matters in relation to this item.</p>		

The Applicants will each be provided with a right of reply.			
Agenda Item 6 – Any Other Business Relevant to the Agenda			
<p>The ExAs may raise any other minor and consequential topics bearing on the project descriptions and options as is expedient, having regard to the readiness of the persons present to address such matters.</p> <p>The ExAs may extend an opportunity for the Applicants, IPs and Other Persons to raise matters relevant to the project descriptions and options that they consider should be examined by the ExAs.</p> <p>If necessary, the Applicants will each be provided with a right of reply.</p>			
Agenda Item 7 - Procedural Decisions, Review of Actions and Next Steps			
The ExAs will review whether there is any need for procedural decisions about additional information or any other matter arising from Agenda items 2 – 4.			

<p>Submissions will be sought from the Applicants and any relevant IPs or Other Persons before determining whether decisions may be required, what they might address and whether timescales for performance are required.</p> <p>If the ExAs determine to make any procedural decisions, they may make these decisions orally (subject to confirmation in writing) or may reserve their decisions to be made in writing after the closure of the hearings.</p>			
Agenda Item 9 - Close of the hearings			