

From: [REDACTED]
To: [East Anglia ONE North; East Anglia Two](#)
Subject: Subject: DEADLINE 4 Submission - East AngliaOneNorth - EN010077 - Reference 20023461 & East Anglia Two Project - EN010078 - Reference 20023462
Date: 13 January 2021 16:17:01
Attachments: [ES Cabinet meeting 050121 SPR DCO item - nuetral.docx](#)

REF 200223461 And REF 200223462.

Dear Mr Smith.

I would just like to draw your attention to the minutes of a cabinet meeting held by East Suffolk Council on the 5th January 2021. (Copy Attached).

It concerns the proposal by Scottish Power renewables to mitigate the traffic problems at the A12/A1094 junction by Friday Farm by putting in traffic lights. (Page 22 Section 7.75). What is even more extraordinary is that ESC seem to have accepted this proposal (Page 30 Point F). Has the world gone mad. All this will do is create even more traffic chaos. It is well known to anybody that who uses the A12 in that area that if traffic lights are put up to do any repairs etc. to the roads around the Farnham/Friday street junction that the traffic quickly grinds to a halt and long queues quickly form in both directions. Add in the extra traffic that is going to be created (Should they go ahead) by these two developments, the secretive extra developments that National Grid have planned for the Friston site, the proposed Sizewell C development, the building of the new bridge at Lowestoft, (Which Lowestoft definitely needs) and the proposed 1000 new homes to be built on the Layers at Saxmundham or any other horrors that may be foisted upon this area in the near future it does not require a genius to realise that putting traffic lights up at that junction is just madness. On a good summers day it will just turn the B1069 through Snape and all the local back lanes into clogged rat runs.

With best regards

David Steen



CABINET

Tuesday, 5 January 2021

EAST SUFFOLK COUNCIL ENGAGEMENT AND POSITION DURING THE EXAMINATION AND POST EXAMINATION PROCESS FOR SCOTTISHPOWER RENEWABLES EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO OFFSHORE WINDFARM PROPOSALS

EXECUTIVE SUMMARY

ScottishPower Renewables (SPR) submitted two separate nationally significant applications for offshore windfarm developments off the East Suffolk coast: East Anglia One North (EA1N) and East Anglia Two (EA2). The applications were submitted in October 2019, the six-month formal Examination period for both applications began on the 7 October 2020. Both projects propose offshore export cables to make landfall north of Thorpeness and run onshore cables underground for approximately 9km. The cables terminate at a site immediately north of Friston village where the onshore substations are to be located.

1.

The Cabinet, at its meeting on 7 January 2020, resolved that whilst maintaining overall support for the principle of offshore wind as a significant contributor to the reduction in carbon emissions, and for the economic opportunities it may bring to the locality, it would raise an objection to specific aspects of the proposals which have significant impacts onshore.

2.

The Applicants have sought to address a number of the specific concerns and objections to the projects raised by the Council. Discussions between both parties have been ongoing regarding further information, modifications, additional mitigation and compensation which would be required in order to persuade the Council to potentially move towards a neutral position in some areas. It is now recommended that Cabinet agrees that the Council can now move towards a neutral position with regards to a number of previously raised concerns with the EA1N and EA2 proposals. However, there are still areas of disagreement with regards to noise, particularly operation noise at the substations site and the cumulative impacts of future energy development that has not yet been satisfactorily addressed. We are also still of the view that further commitments should be sought in relation to the design of the substations and in relation to cumulative impacts with future projects. We therefore


3.





maintain significant concerns in those areas and are seeking additional work from the Applicants.

4. Cabinet is recommended to continue its support for the principle of offshore wind and move its position of objecting to the overall impact of the onshore substations of EA1N and EA2 towards a position of being neutral on both proposals having regard to the enhanced package of mitigation and compensation that the Applicants have now put forward. However, we maintain significant concerns with regard to the noise impacts of the onshore substation elements, substation design and the cumulative impacts of the proposals with future energy projects until such a time that these matters are satisfactorily addressed by the Applicants. The Council will also continue to engage with the Applicants to address areas of concerns raised within the Council's Relevant Representation and Local Impact Report.
5. Cabinet is requested to give delegated authority to the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development, in addition to the delegated authority provided at its meeting on 7 January 2020, to negotiate, resolve and agree any matters on behalf of the Council arising postconsent, should one or either of the projects be consented by the Secretary of State for Business, Energy and Industrial Strategy (BEIS).

Is the report Open or Exempt?	Open
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Wards Affected:	Directly: Aldeburgh & Leiston, Indirectly: Southwold, Wrentham, Wangford & Westleton, Kessingland, Kirkley & Pakefield, Harbour & Normanston, Gunton & St Margarets, Lothingland, Kelsale & Yoxford, Saxmundham
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Cabinet Member:	 Deputy Leader and Cabinet Member with responsibility for Economic Development
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Supporting Officers:	 Head of Planning and Coastal Management  @eastsoffolk.gov.uk  Senior Energy Projects Officer  @eastsoffolk.gov.uk
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1 INTRODUCTION

- 1.1 The EA1N and EA2 offshore wind farms are being developed by East Anglia One North Limited and East Anglia Two Limited (referred to as 'the Applicants'), which are wholly owned subsidiaries of SPR which itself is owned by Iberdrola, a Spanish based

company. EA1N and EA2 are both defined as Nationally Significant Infrastructure Projects (NSIPs) under the 2008 Planning Act. Both projects were submitted to the Planning Inspectorate on 25 October 2019 seeking Development Consent Orders (DCO) and the applications accepted as valid on 22 November 2019. The DCOs will be determined by the Secretary of State for BEIS.

- 1.2 Following acceptance, the Applicants publicised the applications and provided a deadline of 27 January 2020 for the submission of Relevant Representations on the projects. A Relevant Representation is a summary of a stakeholder's views on the applications in writing. The examinations were due to start in March 2020 but the Preliminary Meeting, the close of which signifies the start of the examination, had to be postponed due to Covid-19 and the public health situation. The Preliminary Meeting was rescheduled and held in two parts on 16 September and 6 October 2020, and the examinations began 7 October 2020. The examinations must conclude within a six month period, so the close of the examinations will be 6 April 2021.
- 1.3 EA1N is an offshore wind farm project located approximately 36km from Lowestoft in an area of 208km² with a potential generating capacity of 800 megawatts (approximately 710,000 households) generated by up to 67 turbines. There will be cables running from the offshore element coming ashore at Thorpeness on the East Coast and travelling westwards to connect into a new substation proposed to be constructed immediately to the north of Friston. The proposal includes a separate National Grid substation that is essential to connect into the overhead powerlines that run from Sizewell B to Bramford – north west of Ipswich.
- 1.4 EA2 is an offshore wind farm project located approximately 33km from its nearest point to the coast, Southwold, in an area of 218km² with a potential generating capacity of up to 900 megawatts (approximately 800,000 households) generated by up to 75 turbines. As above, there will be cables running from the offshore element coming ashore at Thorpeness on the East Coast and travelling westwards to connect into a new substation proposed to be constructed immediately north of Friston. The proposal similarly includes a separate National Grid substation that is essential to connect into the overhead powerlines as above. However, each project must apply for the National Grid substation in order to connect into the overhead powerlines but only one National Grid substation will be constructed should both DCOs be consented.
- 1.5 Each project will have their own separate substation alongside the National Grid substation. The proposals assess different scenarios for construction including the projects being constructed simultaneously or consecutively.
- 1.6 East Suffolk Council is working very closely with Suffolk County Council on these projects.
- 1.7 Under the Climate Change Act 2008, UK Government set a 2050 target to reduce CO₂ emissions by 80%, in June 2019 new legislation was signed that commits the UK to a legally binding target of net zero emissions by 2050. Clean growth is at the heart of this aim and supporting and promoting renewable energy over older and dirtier energy resources is a key component of the plan. The Offshore Wind Sector Deal includes an ambition for offshore wind to deliver 30GW of generating capacity by 2030, but the UK Government has pledged to increase the sector's 2030 goal to 40GW. The Climate

Change Committee identified that 75GW of offshore wind capacity would be needed by 2050 to achieve net zero emissions. The Prime Minister also set out recently in his ten point plan for a Green Industrial Revolution, the ambition that the UK will produce enough offshore wind to power every home, quadrupling how much we produce and supporting up to 60,000 jobs. The ten point plan and newly published Energy White Paper both reaffirm the commitment to 40GW by 2030 and illustrate the ambition for a cleaner, greener future for this country.

- 1.8 We recognise the significant contribution East Suffolk will make towards these ambitions by virtue of its geographical proximity to advantageous offshore seabed conditions, and strategic onshore electrical infrastructure. We also recognise the importance of this industry economically to local ports and the towns of Lowestoft and Great Yarmouth.
- 1.9 A report was taken to Cabinet on 7 January 2020 to seek delegated authority to enable the Council to fully engage with the examinations. The report provided a summary of the main concerns in relation to the projects and set out the Council's position, a draft Relevant Representation and early draft Local Impact Report were attached. The recommendations agreed by Cabinet have been set out below:

RECOMMENDATIONS AGREED BY CABINET ON 7 JANUARY 2020

1. That Cabinet grants the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development authority to fully engage with the Pre-examination and Examination stages of the Development Consent Order process in relation to EA1N and EA2 offshore wind farm projects. This will include:

- Submission of Written Representations to expand upon the Relevant Representation where necessary,
 - Submission of Statements of Common Ground between the application and the Council,
 - Attending/authorising technical officers to participate at Preliminary Meetings/hearings/accompanied site visits,
 - Responding to Examining Authority's questions and requests for further information, • Commenting on other interested parties' representations and submissions as appropriate,
 - Signing planning obligations if required.
 - Any other requirements not yet identified.
2. That the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development be authorised to make amendments to the draft Relevant Representation and early draft Local Impact Report as agreed with appropriate representatives of this Council prior to their submission to PINS.
 3. That following agreement by the Cabinet of East Suffolk Council, the draft Relevant Representation set out in Appendix A and summarised below, subject to any agreed amendments, be submitted to PINS.
 4. That PINS is informed by the Relevant Representation that East Suffolk Council recognises the national benefit these projects will bring in meeting the renewable energy targets and creating sustainable economic growth in Suffolk provided this is achieved without significant damage to the local built and natural environment, local communities and tourist economy. Notwithstanding this, the Council has significant concerns on the following matters:
 - Landscape and Visual Effects
 - Noise
 - Design and Masterplan
 - Traffic and Transport
 - Seascape and Visual Effects
 - Cumulative Impacts
 - Measures to address residual impacts of the projects

The Council also has concerns or wishes to make representations in a number of additional areas which have been outlined below:

- Socio-Economic Impacts
- Heritage
- Air Quality
- Public Rights of Way
- Flood Risk
- Ecology
- Coastal Change
- Archaeology
- Construction Management

East Suffolk Council is supportive of the principle of offshore wind development, recognising the strategic need for zero carbon energy and the contribution the industry can make to sustainable economic growth in Suffolk. This must however be achieved without significant damage to the environment, local communities and tourist economy of East Suffolk. The projects as designed to

date will result in significant impacts as set out above, particularly in relation to the environment around the substation site and significant effects on the designated landscape. Based on the current submissions East Suffolk Council objects to the overall impact of the onshore substations and raises significant concerns regarding the significant effects predicted from the offshore turbines on the Suffolk Coast and Heaths AONB.

5. That following agreement by the Cabinet of East Suffolk Council, the early draft Local Impact Report set out in Appendix B, subject to appropriate amendments, be submitted to PINS by the relevant deadline.
6. That this Council continues to engage with SPR to identify means by which the impact of the proposals can be mitigated and/or compensated if the developments do take place and seek appropriate s106 agreements to secure the necessary mitigation and/or compensation.
7. That Cabinet notes the continued work with Government, namely MHCLG and BEIS with regards to the cumulative impacts on East Suffolk of the numerous energy projects existing and forthcoming.

1.10 East Suffolk Council submitted their Relevant Representation by the appropriate deadline in January this year. The Local Impact Report was prepared jointly with Suffolk County Council and submitted at Deadline 1 (2 November 2020) of the examinations as required.

1.11 The Council continues to be supportive of the principle of offshore wind development, both in terms of seeking to reduce carbon emissions and creating sustainable economic growth in Suffolk. This includes providing for long term employment for some of our coastal communities, provided this can be achieved without unacceptable impacts to the environment, residents and the tourist economy of Suffolk.

1.12 We have continued to work with the Applicants since the submission of the applications to seek to address areas of concern and narrow the issues in dispute as is expected and appropriate during the DCO process.

2 PLANNING POLICY CONTEXT

2.1 The Planning Act 2008 makes provision for National Policy Statements, which set out the policy framework for determination of NSIP applications. The three NPSs of relevance are EN-1 (Overarching NPS for Energy), EN-3 (NPS for Renewable Energy Infrastructure) and EN-5 (NPS for Electricity Networks Infrastructure). The Government has pledged within the Energy White Paper published on 14 December 2020 to review the energy NPSs by the end of next year. At the present time however, these policy statements continue to provide the relevant policy framework against which to assess these projects.

2.2 The revised National Planning Policy Framework (NPPF) published in 2019 does not contain any specific policies for NSIPs but remains a material consideration.

2.3 The new Local Plan 2020 covering the former Suffolk Coastal area was adopted by Full Council on 23 September 2020 and is now a material consideration. It includes policy SCLP3.5 'Proposals for Major Energy Infrastructure Projects'. This policy identifies the need to mitigate the impacts arising from such developments and will be used to guide the Council. The Council's Local Impact Report provides further guidance on relevant planning policy and can be viewed using the following link <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010078/EN010078-002816-DL1 - Suffolk County Council - LIR.pdf>. It should be noted however that NPS's will usually over-ride local planning policy.

2.4 It is clear, as set out in paragraph 1.7, that the UK Government considers that offshore wind has a significant role to play in not only helping to deliver net zero ambitions but also in the economic recovery post Covid-19. There is therefore clear Governmental support for the delivery of offshore wind projects.

3 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?

3.1 The East Suffolk Strategic Plan 2020-2024 recognises the energy sector as a key sector for East Suffolk and identifies renewables energy as a key priority.

4 FINANCIAL AND GOVERNANCE IMPLICATIONS

4.1 SPR are funding the Council's officers through an agreed financial arrangement which involves the charging of SPR for officer time on an hourly basis. We also work closely with other partners including Suffolk County Council and engage with other statutory bodies to ensure we fully address all aspects of the development. East Suffolk Council will be taking the lead during the Examination in areas that we are the responsible authority for including design, heritage, conservation, coastal management, tourism, noise and landscape. Suffolk County Council will be leading on highways matters including public rights of way as part of their responsibility as the Local Highway Authority, local flood risk and drainage matters as part of their responsibility as the Lead Local Flood Authority and in relation to archaeology, emergency planning and public health.

5 OTHER KEY ISSUES

5.1 This report has not carried out an Equality Impact Assessment, as this Council is a statutory consultee in the NSIP planning process, it is the responsibility of the Applicants to carry out an Equality Impact Assessment.

6 CONSULTATION

6.1 The Council has not carried out its own formal consultation with town and parish councils and we are not obliged to do so by the NSIP process. There are a number of action groups formed in relation to the proposals and we have engaged with them where we

have been able to. We have also undertaken internal consultation with technical officers and continued to engage with other relevant external stakeholders.

7 PROPOSALS

- 7.1 The previous Cabinet report on 7 January 2020, in summary, proposed that the Council is supportive of the principle of offshore wind development, provided this can be achieved without significant unacceptable damage to the environment, residents and tourist economy of Suffolk.
- 7.2 The Councils however considered the projects as designed at that time would result in unacceptable significant impacts, particularly in relation to the environment around the substation site and significant effects on the designated landscape without sufficient mitigation or compensation proposed. Based on the submissions at that time, the Council objected to the overall impact of the onshore substations and raised significant concerns regarding the significant effects predicted from the offshore turbines on the Area of Outstanding Natural Beauty (AONB). The Council also highlighted a number of other concerns in relation to the impacts of the developments.
- 7.3 In order to address some of the Council's concerns a package of mitigation measures and compensation measures have been proposed by the Applicants. These have been carefully assessed with regards to the potential improvements and mitigatory and compensatory measures that could be achieved if the proposals are accepted by the Council. The report details these measures. At the end of this section there are tables which summarise the package of measures/funds that were proposed ahead of the Examinations commencing (Paragraph 7.84, Table 1) alongside the enhanced offer that has now been presented by SPR (Paragraph 7.87, Table 2).

Offshore Elements

- 7.4 The Applicants identified through the Seascape and Landscape Visual Impact Assessment (SLVIA) that the offshore infrastructure associated with EA2 alone and in combination with EA1N, will result in significant adverse landscape and visual effects on the character and special qualities of the AONB. The offshore turbines will have a significant and longterm negative impact on the nationally designated landscape. The horizon and sea views along this coastline are largely uncluttered and as such contribute to the character of place and setting of the AONB and Heritage Coast.
- 7.5 The Council did not consider at the time of preparing the Cabinet report, that the Applicants had demonstrably exhausted all reasonable mitigation measures in terms of the design of the schemes, including the turbine heights. Following further review and engagement with the Applicants and Natural England, it has also been accepted that EA1N will not contribute significantly to the cumulative effects on the AONB with EA2 and therefore further mitigation to EA1N cannot be justified.
- 7.6 It should be noted that the principal consultee in respect of the impacts of the developments on the AONB and their significance is Natural England and therefore we will ultimately be deferring to Natural England on this matter.

New Mitigation/Compensation Measures – Offshore

- 7.7 The Applicants have committed to a reduction in the maximum height of the turbines proposed for both projects from 300m to 282m. This is a welcomed revision which will help to reduce the impacts of the projects.
- 7.8 In addition to the reduction in the maximum height of the turbines of both projects, the Applicants accept that residual impacts as a result of EA2 on the AONB will remain and that these cannot be fully mitigated. In response and as a result of engagement with the Council, the Applicants have proposed a compensatory fund which will support the delivery of measures to offset the harm caused to the AONB. The fund provides £465,000 for measures to support access, environmental and ecological enhancements to the AONB.
- 7.9 The compensation would be utilised to fund projects which seek to strengthen the existing qualities of the AONB. Although the Council consider that further mitigation measures to the layout and height of the turbines of EA2 remain possible, and this is a view we will express during the examination, we accept that a fund provides a level of compensation for the identified residual impacts.

Onshore Elements

- 7.10 The projects share the same Onshore Order Limits and therefore the impacts of the projects have been discussed together below. The report will now seek to outline what issues were raised in the previous Cabinet report and what measures the Applicants have proposed to address them.

Substation Site

- 7.11 The Council raised an objection to overall impact of the onshore substations. Based on the information available at the time, the Council raised significant concerns in relation to the onshore substation infrastructure associated with EA1N and EA2 and their impacts on landscape and visual amenity, noise, design, cumulative impacts and the level of mitigation/compensation proposed. In addition, the Council raised concerns regarding heritage, public rights of way and flood risk. Collectively, when these areas of concern were taken together, it was considered that they would have a significant adverse impact on the environment around the substation site. The mitigation proposals presented at the time did not satisfactorily address the concerns raised.
- 7.12 The Council has been engaging with the Applicants to seek positive changes to the design of the substations in addition to measures to strengthen the mitigation and compensation measures provided in relation to the substations site.

Landscape and Visual Amenity

- 7.13 The impacts of the substations and National Grid connection infrastructure on landscape and visual amenity was highlighted in the Council's Relevant Representation as a significant concern. The projects will result in significant visual impacts and

permanent change to the character of the landscape at the substations site, including the surroundings and amenity of the village of Friston.

- 7.14 There is also a concern that the Applicants have not fully understood the impact on the character and significance of the historic landscape character. The Council has therefore requested that further assessment is undertaken in relation to this.
- 7.15 The effectiveness and timeliness of the proposed mitigation planting was expressed as a concern as the assumed growth rates are not considered reasonably likely to be achieved in the local conditions. Concerns have also been expressed regarding the degree to which the visualisations accurately represent the mitigation planting at year 1 and 15 post construction. The year 1 visualisations included unsecured early planting and some of the year 15 images showed planting, trees and vegetation of a significantly greater maturity than the 15 years growth specified. The Council has been engaging with the Applicants to address these concerns and requested updated visualisations be provided.
- 7.16 The Council has continued discussions with the Applicants regarding the representation of the planting within the visualisations. The Applicants have now provided a selection of updated visualisations which provide a more realistic depiction of the proposed mitigation planting at year 15, early planting has also been removed from the images. The Applicants have also committed to the provision of further mitigation planting at the substations site and provided more information regarding the location of early planting which is detailed in the Outline Landscape and Ecological Management Strategy (OLEMS). In order to help address the concerns regarding the proposed growth rates and timeliness and effectiveness of the mitigation, in addition to early planting, the Council has requested the Applicants commit to more adaptive and dynamic programme of planting aftercare and maintenance. The Applicants confirmed this commitment at Deadline 3 of the examinations.
- 7.17 As the Landscape and Visual Impact Assessments (LVIAs) identify significant residual impacts on the landscape character and visual amenity, the Council has requested that offsite planting is provided. Offsite planting should be provided in strategic locations to reinforce field boundaries and public rights of way in the locality. A mechanism to provide funding for this additional planting has now been agreed.
- 7.18 In addition to seeking further mitigation planting the Council has been engaging in positive discussions with the Applicants to secure further embedded mitigation in the form of reductions in the size and scale of the substation infrastructure. Commitments to such reductions were secured at Deadlines 2 and 3 of the examinations and will be highlighted within this report.
- 7.19 The long term management of the site has also been highlighted as a concern as insufficient information was provided in the Environmental Statements to detail how this will be managed for the lifetime of the site's operation. The Council will continue to engage with the Applicants to seek appropriate commitments in this regard.

Noise

- 7.20 Significant concerns were raised in the Relevant Representation regarding the adequacy of the noise assessment which it is considered underestimates the noise impacts at the substations site. The Council is particularly concerned that the Applicants assumed background noise level is an overestimate of the typical background sound levels at the receptors and therefore the setting of an operational noise rating level of 34dB set by the draft DCOs, will result in a greater significance of effect. The assessments have also not considered non-residential receptors. If consented, the projects will change the sound climate in the surrounding area on a permanent basis.
- 7.21 The Council is aware of existing and potential connection offers being made by National Grid which could result in further development in the locality. Future assessments would then be based on the 'new' sound climate including the EA1N and EA2 projects and result in continued noise creep.
- 7.22 The Council has been engaging with the Applicants to seek further information and clarifications on the modelling and it is understood the Applicants will be providing further information during the examinations. This however remains an area of professional disagreement. The Council will continue during the examination to highlight our significant concerns regarding the operational noise impact of the substations.

Heritage

- 7.23 The Council's Relevant Representation set out our concerns regarding the impact of the projects to the significance of a number of listed buildings which surround the substations site due to the impact of the developments on their setting. There is a concern that the assessments under predict the level of harm caused to a number of the assets. The projects will also result in the loss of a track/public right of way which also comprises the historic parish/Hundred boundary between Friston and Knodishall which runs directly through the middle of the proposed substations location. The Council's concerns were set out to the Examining Authority during the second Issue Specific Hearing held at the beginning of December.
- 7.24 The Council has discussed the areas of concern in relation to the assessments with the Applicants, but this remains an area of professional disagreement. It is not possible to mitigate the effects of the projects through landscaping and therefore the Council considers that appropriate compensation is necessary. The Council will continue to engage with the Applicants to seek commitments for further reductions in the size of the onshore substations but has also secured a commitment from the Applicants to provide compensation.

Flood Risk

- 7.25 Although recent flood events in Friston are not thought to have had their origin within the proposed substations site, the information within the submissions is not sufficient to determine how the proposed development would interact with existing drainage patterns. Further information is also being sought to demonstrate there is sufficient space within the Order Limits to accommodate infiltration features in addition to attenuation features at an agreed discharge rate. Suffolk County Council as the Lead

Local Flood Authority are leading on this issue during the examination. Discussions with the Applicants are ongoing in relation to this matter.

Public Rights of Way

- 7.26 The projects will result in the access network around the village of Friston being disrupted during construction and also during operation by virtue of the permanent loss of a key public footpath. The impact of the developments on the amenity and quality of the user experience of the public right of way network has not been adequately addressed. Suffolk County Council as the Local Highway Authority are leading on this matter during the examination. Discussions with the Applicants are ongoing in relation to this matter.

Substation Design

- 7.27 It is important to ensure that all reasonable endeavours have been made to minimise the scale of the substations through the exploration of opportunities for infrastructure consolidation, design refinement and potentially the use of gas insulated technology in the National Grid substation rather air insulated. There was and is still considered insufficient commitment within the submissions to ensure that the scale of the buildings and infrastructure associated with the substations will be minimised during the detailed design process if the projects are consented. This concern was highlighted within the Relevant Representation and the Council will continue to seek a firm commitment to this through the examinations.
- 7.28 The Applicants have provided an outline document which identifies the key design principles for the EA1N and EA2 substations. The Council has requested that a similar document is provided for the National Grid substation and that this infrastructure is subject of the same approval process post-consent with the local planning authority. The Applicants have agreed to this request. The Council has also requested further revisions to the outline design principles statements which we will continue to seek through the examinations.
- 7.29 The Council has also continued to engage with the Applicants seeking reductions in the overall footprint and height of the infrastructure and a commitment to take all reasonable efforts to seek further reductions post consent during the design refinement process. The Applicants have recently confirmed a number of positive changes to the design of the onshore substations which will be detailed more fully in paragraphs 7.367.40.

Cumulative Impacts of Future Connections

- 7.30 The Council is aware of the two interconnectors (Eurolink and Nautilus) proposed by National Grid Ventures to be connected to the national grid in the Leiston area. It is however understood that if the National Grid substation proposed under the EA1N and EA2 projects is consented, this would be the point of connection for the interconnector projects also. In addition to the interconnector proposals, the Council has been made aware that the Five Estuaries offshore wind project (formerly Galloper Extension) was given a preliminary connection offer at the proposed substation immediately north of Friston village. This illustrates that the National Grid substation proposed within the

applications is being seen by National Grid as a strategic connection point for future projects. This is without the potential impacts being cumulatively assessed, and without any of this future development being considered within the existing design considerations for the site. The Council continues to request that as a minimum the works to the National Grid substation which are necessary to accommodate the future connections should be considered in a Cumulative Impact Assessment (CIA).

- 7.31 The Applicants are of the view that their CIA is robust and in accordance with guidance and therefore have not yet committed to further work in this area. The Council highlighted the concerns regarding the cumulative impacts of future projects during the second Issue Specific Hearing held at the beginning of December and will continue to raise significant concerns regarding this matter during the examinations.

New Mitigation/Compensation Measures – Substations Site

- 7.32 As stated above, the Council has continued to engage with the Applicants to secure a more appropriate package of mitigation/compensation for the substations site. The key areas of concern have been set out above and some of the key measures to address these outlined below.

- 7.33 *Adaptive aftercare management:* The Applicants have committed to an adaptive aftercare management regime in relation to the substation mitigation planting – this will allow the aftercare period of 10 years to be suspended and measures employed if the planting did not achieve pre-set objectives. Notwithstanding the Council's position on growth rates, this measure seeks to provide the Council with greater confidence that the mitigation planting will be able to be delivered in a timelier manner. If parts of the planting suffer delayed growth or fail, the supervised aftercare period would effectively extend beyond the ten years.

- 7.34 *Additional Planting and Location of Early Planting* – The Applicants have committed to the provision of further mitigation planting at the substations site and also provided further details regarding the locations of early planting. This additional planting similarly seeks to help provide more timely and effective mitigation and is welcomed.

- 7.35 *Selection of updated visualisations* – The Applicants have provided a selection of updated visualisations to illustrate a more realistic depiction of the mitigation planting at year 15 and the removal of the early planting. The visualisations also seek to illustrate the proposed design improvements which have been secured. This is welcomed as the planting currently depicted shows trees of a greater maturity than 15 years.

- 7.36 *Design improvements:* The Applicants have committed to a reduction in the footprint of the project substations from 190m by 190m to 170m by 190m – the western extent of the substations will move 40m eastwards – the Council has been seeking a reduction in the onshore substation footprints. This change allows the retention of a wooded area which would have been lost based on the previous proposals.

- 7.37 The Applicants have also committed to reductions in the maximum heights of the EA1N and EA2 substation infrastructure. As a result, the maximum building and equipment heights within the DCOs for the substations will be 14m, which is a reduction of 1m for

the buildings and 4m for the equipment compared to what was previously proposed. A 5m reduction has also been secured for the lightning protection masts, these will now be a maximum of 20m.

- 7.38 The Applicants have also refined the finished ground levels of the substations and confirmed that a reduction of 2m for the eastern substation and a reduction of 0.7m for the National Grid substation can be achieved.
- 7.39 The combination of the reductions in the height of the infrastructure and the refinement of the finished ground levels means that the maximum building and equipment height for the eastern substation will be 3m lower than that presented in the Environmental Statements, 1m lower for the western substation and for the National Grid substation 0.7m lower than previously proposed. In terms of the lightning masts these will be 7m lower for the eastern substation and 5m lower for the western than previously presented in the Environmental Statements.
- 7.40 These reductions in the footprint, maximum heights and finished ground levels of the onshore substations are welcomed. Should the projects be consented the Council will continue to seek further reductions post consent.
- 7.41 *Outline Design Principles Statements* - The Applicants have also committed to the production of an Outline Design Principles Statement for the National Grid substation, one has been produced for the EA1N and EA2 substations, this was in response to a request by the Council. The Council will seek to ensure that this statement applies to the National Grid substation but also the sealing end compounds which form part of the necessary connection infrastructure. The design principles can then be utilised during the post consent design refinement process. In addition, we will continue to push the Applicants through the examination process to commit to seeking further reductions in footprint and height of the onshore substations infrastructure and also to seek a firmer commitment to achieve this post consent.
- 7.42 *Section 111 of the 1972 Local Government Act (s111) agreement:* This agreement secures a compensatory fund including an administration fee, to East Suffolk Council, which has been increased in recognition of the total impacts evidenced by the Council. The sums proposed in total for both projects combined which relate specifically to the impacts of the onshore substations include:
- a) £355,000 to provide further landscape, environmental, access and amenity improvements and enhancements to Friston and its vicinity.
 - b) £150,000 to undertake landscape, environmental, access and amenity enhancements within 1.5km of the substations.
 - c) £400,000 as a contribution towards measures relating to the preservation and enhancement of heritage assets and their settings in Friston and its vicinity.
- 7.43 The Council considers that sums provided by the s111 agreement could deliver:
- Strategic offsite planting in addition to this providing money for the local community/landowners to undertake their own private planting.
 - Noise mitigation measures.

- Landscape and ecological enhancements through reinforcing hedgerows, new hedgerow planting, woodland planting etc.
- Access improvements including potential creation of a new bridleway link between Snape and Friston, diversion of crossfield paths onto field headlands, improvements to the surface of public rights of way etc.

7.44 The reductions to the maximum design parameters of the onshore substations provide welcomed embedded mitigation for the developments. The additional mitigation and early planting proposed in addition to funding to provide offsite planting will help in time to reduce the visual impact of the developments. The Council also welcomes the Applicants agreement to adaptive aftercare and maintenance. It is not possible however to fully mitigate the impacts of the onshore substations and therefore the Applicants have sought to provide compensation to offset the harm caused. The measures above seek to help address the Councils concerns regarding the timeliness of the delivery of effective mitigation, provide compensation for the harm to heritage assets and provide compensation for the disruption to the public right of way network. Based on the information provided the Council is able to move towards a more neutral position on these matters but will continue to fully engage with the examination process highlighting areas of concern but not objection.

7.45 Notwithstanding the improvements we have secured, we still maintain a difference of opinion with regards to the adverse impact of noise from the onshore substations which we will be pursuing through the Examinations. We also maintain a difference of opinion regarding whether all reasonable measures have been undertaken to ensure the scale and size of the substations will be minimised and regarding the design of the National Grid substation and whether this should be designed to accommodate future known connections or at the very least the impact of the future connections considered in the CIA. These will remain matters of significant concern until they are satisfactorily addressed.

7.46 The Council will also continue to support Suffolk County Council in raising outstanding concerns in relation to the areas they are leading on through the examinations.

Cable Route and Landfall

7.47 The Council's Relevant Representation did not raise an objection to the impacts of the construction works associated with the cable routes or landfall locations but some concerns were raised regarding the impacts on landscape and visual amenity, public rights of way, ecology, construction noise and the method of construction/construction management.

7.48 The Council has continued to engage with the Applicants and secured some positive changes in relation to the proposals. Significantly, the Applicants have committed to a more coordinated method of construction in the event the projects are consented and constructed sequentially. Further mitigation has also been secured to reduce the impact on bats during construction, reduce woodland loss and give consideration to sensitive locations along the cable

route close to properties. The Applicants have also committed to the provision of compensatory measures in relation to landscape, AONB, public rights of way and ecology.

Landscape and Visual Amenity

- 7.49 The projects propose to underground the cabling in its entirety which it is recognised provides significant mitigation against the visual and landscape impacts. The development does however still result in the loss of numerous sections of important hedgerows and trees. These hedgerows are often characterised by substantial trees which if removed and not replaced would result in the significant adverse impacts on the landscape character persisting for longer than assessed. Whilst it is noted that the intention is to reduce the working width of the cable corridor (from 32m to 16.1m) wherever possible, this still represents a notable impact on the existing historic hedgerow pattern which is a key characteristic of the prevailing landscape character types.
- 7.50 The Applicants have confirmed to the Council that all reasonable measures will be taken in terms of minimising cable corridor widths and micro-siting during the post consent work to try and minimise the loss of important trees and sections of hedgerows. The Council has also secured compensatory measures.

Ecology

- 7.51 The Council raised concerns in the Relevant Representation that there are some ecological receptors which are either not fully assessed or have insufficient mitigation/compensation measured identified and secured by the draft DCOs. These include bats, hedgerows, woodlands and trees during construction and the designated sites in relation to adverse impacts on air quality during construction. In addition, the Council has highlighted the lack of commitment to ecological enhancements.
- 7.52 The Council has been engaging with the Applicants on these matters to seek to address the concerns raised.

Public Rights of Way

- 7.53 The previous comments in relation to the substations site regarding the lack of assessment on the impact on the amenity and quality of the user experience of the rights of way network remains a concern. The construction works will result in the disruption to numerous public rights of way and although the applications have sought to address the logistical aspects of the closures, the impact on the amenity of the rights of way is not addressed. Suffolk County Council as indicated previously will be leading on this matter during the examinations but the Council has sought compensation in relation to the disruption caused.

Coastal Management

7.54 The Council's Relevant Representation highlighted that further information was necessary to demonstrate that the proposed works would not cause local cliff destabilisation or damage to the subsea crag outcrop. The Council has continued to engage with the Applicants and is now confident that this matter can be satisfactorily addressed.

Construction Noise

7.55 Significant levels of construction noise and vibration are likely to occur at some sensitive receptors during the construction periods. The Council is concerned that there is insufficient information presented in the submissions to determine if the noise predictions are representative and there is a concern that there may have been an underestimation of the noise impacts. It is however acknowledged that construction proposals cannot be fully developed until contractors are appointed and prediction methodology includes necessary assumptions. There are however certain points along the onshore Order Limits where construction works are very close to residential receptors and it is at these locations that the Council consider enhanced mitigation may need to be employed. The Council has continued to discuss this matter with the Applicants and raised this concern during the second Issue Specific Hearing at the beginning of December.

Method of Construction

7.56 The Councils consider that the Applicants should commit to the simultaneous construction of the projects, if however this is shown not to be possible, as a minimum the first project should install ducting for the second project and thereby reduce the level of disturbance caused to the local communities and environment. This was successfully achieved in relation to East Anglia One and East Anglia Three offshore wind projects. The Applicants have made some positive commitments in relation to this which will be set out in the next section.

New Mitigation/Compensation for the Cable Route and Landfall Locations

7.57 As stated previously, the Council has continued to engage with the Applicants to secure appropriate mitigation and compensation, the new measures secured in relation to the cable route and landfall have been outlined below.

7.58 The s111 agreement previously discussed also secures compensatory funds to be provided to compensate for the residual impacts identified by the assessments along the cable route in relation to the projects. These include:

- £400,000 to be spent in the area from the landfall to the substation including the AONB to support landscape, ecological and habitat enhancement, improve the public rights of way network in the vicinity, and fund measures to strengthen the existing qualities of the AONB.

- 7.59 The Council considers that sums provided by the s111 agreement could deliver the following types of projects, which would help to offset some of the impacts identified in terms of landscape and visual amenity, public rights of way and ecology:
- Landscape and ecological enhancements through reinforcing hedgerows, new hedgerow planting, woodland planting etc.
 - Access improvements including creation of a new bridleway link from Leiston to Thorpeness and the coast, improvements between the links between Thorpeness and Aldeburgh etc.
 - Strengthen qualities of the AONB by funding projects which are linked to the AONB Management Plan and its objectives.
- 7.60 The Applicants have recently committed to reduce the onshore cable corridor widths to a maximum of 16.1m for one project or 27.1m for both projects through woodland to the east of Aldeburgh Road, Aldringham. This commitment mirrors the existing commitment for reduced corridor widths through woodland to the west of Aldeburgh Road. This will help to reduce woodland loss. The Applicants have also committed to a reduction in the working width at the Hundred River crossing.
- 7.61 In order to further address some of the Council's ecological concerns the Applicants have committed to providing additional information in relation to the impacts from construction traffic emissions on designated sites, further mitigation measures in the form of planted hurdles to maintain bat foraging and commuting routes during construction, and details regarding the ecological enhancements provided by the projects. The Council is continuing to discuss with the Applicants the stated ecological enhancements provided.
- 7.62 The Applicants have provided further information in the form of an Outline Landfall Construction Method Statement to address the concerns raised at the landfall. The Council is satisfied that the Outline Landfall Construction Method Statement covers Coralline Crag impact avoidance, management of cliff destabilisation by vibration risk and other matters relating to the planning of works regarding potential coastal change, to an acceptable standard.
- 7.63 A revised Outline Code of Construction Practice was submitted at Deadline 3 which recognises that there are some sensitive locations along the cable route where residential properties are in close proximity to the Onshore Order Limits and therefore potential construction works. The Council will continue to work with the Applicants to seek appropriate commitments to mitigation in these locations within the final Code of Construction Practice.
- 7.64 The Applicants have also confirmed that should the projects be constructed sequentially, the ducting for the second project will be laid at the same time as the cabling for the first project. This commitment is welcomed and will help to reduce the construction impacts associated with the second project. This commitment will be secured through the DCOs. The Council will also continue to push for the Applicants to work with the Government through the BEIS

Offshore Transmission Network Review to explore any opportunities for greater coordination between the projects.

- 7.65 The Council did not object to the works associated with the cable route or landfall and therefore our overall position will remain unchanged from that agreed at the Cabinet meeting in January, although during the examinations we will highlight where the new measures have addressed our concerns and continue to seek to reduce impacts of the projects where possible.

Project Wide Impacts

Socio-Economic Impacts

- 7.66 The Councils set out in their Relevant Representation that the developments have the potential to deliver significant positive socio-economic benefits, which are very much welcomed. There is a high-level ambition to develop a sustainable regional and national supply chain with the indirect benefit of increased education and training that the offshore projects can bring to the region. It is however important that every effort is made to ensure a significant proportion of these benefits is localised. It is recognised that whilst the positive benefits are regionally felt, the negative impacts of the developments are felt more locally.
- 7.67 Notwithstanding the positive socio-economic impacts which the projects could bring, the Council expressed concerns in relation to the cumulative pressures on the labour force and on accommodation for workers in combination with other major infrastructure projects, in particular the proposed Sizewell C new nuclear power station. The potential impact on tourism is not considered to be adequately addressed within the submissions especially when the results of the visitor survey undertaken by the Destination Management Organisation (2019) are considered. The Council is concerned that the projects will negatively impact on visitors' perceptions and therefore impact their behaviour during the construction phase(s).
- 7.68 The Council has been discussing these concerns with the Applicants and further information and mitigation measures have been provided.

Traffic and Transport

- 7.69 The Council has raised significant concerns within our Relevant Representation in relation to several highways matters. Suffolk County Council will be leading on this matter during the examinations as they are the Local Highway Authority. Concerns have been raised regarding the impacts of Abnormal Indivisible Loads (AILs) and the adequacy of the mitigation proposed by the Applicants. The A12/A1094 Friday Street junction has a history of collisions most notably relating to right turning vehicle movements across the A12. It is considered that the proposed developments will further exacerbate these issues given the increase of right turn movements associated with the projects. The mitigation proposed in the Environmental Statements set out below is not considered adequate:

- A reduction in the posted speed limit in advance of the junction from 50mph to 40mph;
- Provision of enhanced warning signage to better highlight the junction to approaching drivers; and
- Provision of 'rumble strips' and associated slow markings, to provide an audible and visual warning of the hazard to approaching drivers.

7.70 The increase in traffic will mean that there will be fewer gaps for vehicles to undertake turning manoeuvres. This is considered the most important transport issue arising from these projects. The Applicants have considered carefully the safety concerns highlighted in relation to the A12/A1094 junction and a potential solution has been identified.

7.71 The Council will also continue to support Suffolk County Council in seeking to address other highways concerns highlighted in the Local Impact Report.

Air Quality

7.72 The Council raised concerns in relation to the impacts of the projects from construction vehicle emissions at the Stratford St Andrew Air Quality Management Area (AQMA) in our Relevant Representation. The Council also raised some additional concerns regarding the effect of re-routed traffic, impacts on ecological receptors, port related traffic emissions and construction dust nuisance. The Applicants have provided additional information to seek to address our concerns and also agreed to contribute towards monitoring in the AQMA.

New Mitigation/Compensation for the Project Wide Impacts

7.73 The Applicants have provided a Socio-Economic Clarification Note which has addressed the Council's concerns regarding the cumulative impacts of the projects with Sizewell C on the labour force and demands for accommodation.

7.74 The Applicants have provided two Air Quality Clarification Notes and a Sizewell C CIA Clarification Note to seek to address the Councils air quality concerns. The Councils are continuing to engage with the Applicants on this matter and are hopeful of a positive resolution. The Applicants have also committed to updating the Outline Code of Construction Practice to provide greater clarity regarding dust mitigation and have provided of an Outline Port Construction Traffic Management Plan and Travel Plan which includes a commitment to consider air quality impacts as a result of port traffic. This further work is welcomed.

7.75 In addition to these measures the Applicants have also committed to the following:

- *Skills, Education and Economic Development Memorandum of Understanding (MoU)*: there have been *similar* MoUs for East Anglia One (EA1) and East Anglia

- Three (EA3), and we have been very pleased with the benefits and results that SPR has brought to the region through investment in skills and education. From an employment perspective, this MoU will include reference to ‘best endeavours’ to site the operations and maintenance base (O&M) in or around Lowestoft (where the EA1 operations and maintenance base is currently). The EA1 O&M base was part of a £25m investment in the Port of Lowestoft by SPR, providing approximately 100 long term jobs in addition to sustaining many more jobs in the supply chain. The MoU also commits to support local suppliers and work with SPR’s supply chains to promote opportunities to maintain and raise the local content of offshore windfarms. As part of the EA1 project £45m was spent in construction contracts to companies within 9 miles of Lowestoft.
- *Tourism Fund:* The Applicants have agreed to provide a fund of £150,000 to be used by East Suffolk Council in consultation with the Suffolk Coastal Destination Management Organisation and Suffolk County Council to support marketing campaigns to promote the area during construction and boost tourism. This will help to address the Councils concerns regarding the potential adverse impact on visitor perceptions caused by the construction of the projects.
 - *Friday Street Junction (A1094/A12):* The Applicants have agreed to provide a traffic light solution to this junction to improve road safety, this will be funded wholly by the project working in conjunction with Suffolk County Council Highway Authority.
 - *Air Quality:* a contribution to a monitoring and mitigation fund (this is directly linked to the AQMA at Stratford St Andrew and indirectly linked to the Sizewell C project). This will provide funding to monitor emissions in the AQMA during construction of the projects. Should the Sizewell C project construct and have in operation the Two Villages Bypass of Stratford St Andrew and Farnham prior to work commencing on EA1N or EA2, this contribution will be adjusted to reflect this.
 - *Environmental Exemplar Memorandum of Understanding:* SPR are proposing an MoU signed by SPR, East Suffolk Council and Suffolk County Council, to collaborate on projects to support ambitious aims to improve biodiversity and drive the decarbonisation of energy used in homes and travel. The detail is still being developed collaboratively but a contribution of £500,000 (£250,000 per project) will be provided to enable the co-signatories and their agents to deliver projects within the communities neighbouring the onshore aspects of the EA1N and EA2 projects. It is expected that 50% of each project fund would be put into the trust following successful final investment decision and a further 10% would be released each year over a period of five years. The MoU can also be combined with other funds, such as those provided by EDF Energy in connection with Sizewell C, enabling the benefits to be maximised. The MoU could be utilised to support projects which seek to aid the net zero transition or enhance biodiversity/encourage the appreciation of it, such as:
 - ✦ Contribution to hydrogen or electric battery powered public transport;
 - ✦ supply of subsidised e-bikes for recreational use;
 - ✦ supply of EV community pool car;

- ✦ Contribution to the installation of hydrogen electrolysers;
- ✦ Supply of individual home energy audits;
- ✦ Provision of electricity distribution network feasibility//domestic supply;
- ✦ enhance biodiversity and accessibility of the existing network or footpaths and cycle paths;
- ✦ enhance existing publicly owned green spaces and verges for biodiversity; ✦ create new spaces such as biodiversity banks or rewilding sites; ✦ enhance access to tourist and recreational sites locally.

- *Community Benefits Fund*: This is a fund of £2.5m in total which will be provided by SPR on an annual basis at £100,000 per year to the Suffolk Community Foundation in recognition of the residual impacts to East Suffolk of hosting an offshore wind farm with its onshore requirements. This Fund will be available to the host communities to bid into.

7.76 The measures outlined above seek to address the key concerns the Council raised in their Relevant Representation and Local Impact Report regarding socio-economic and tourism matters, highways and air quality concerns around the Stratford St Andrew AQMA. The Council will continue to engage with the Applicants regarding any remaining concerns in relation to these matters and make appropriate representations at the examinations.

Council's Position on EA1N and EA2

- 7.77 In recognition that the principle of this development will accord with the Council's earlier declaration of a Climate Emergency, it is considered that the Council can move towards a position of neutrality on both projects in recognition of the additional mitigating and compensatory measures provided by the Applicants for the majority of the projects. The additional pledge of investment into East Suffolk to promote overall green improvements, particularly in the locality of the two developments is a direct result of pressure from this Council. This investment covering a five-year period with an initial contribution followed by annual payments for five years, will be spent in the locality on projects that meet our agenda in addressing the climate emergency.
- 7.78 In addition to the measures outlined above, the Council is also working closely with the Applicants to address the remaining concerns outlined in the Councils Relevant Representation and Local Impact Report and will continue to raise these matters during the examinations until such time that they are adequately addressed.
- 7.79 Although the Council remains in positive dialogue with the Applicants, we continue to have significant concerns with regards to the proposed noise limit for the site and the associated impact on residential amenity and character of the area. We will continue to engage with the Applicants regarding the adequacy of the noise assessment and specifically regarding the background noise level and the considered underestimation of the operational noise impacts at the substations site. We will therefore continue to express significant concerns regarding the assessment of the projects in relation to operational noise aspects until such time that our concerns have been addressed.

- 7.80 The Council welcomes the Applicants commitment to reduce the size and finished ground levels of the onshore substations. The Council is however not yet satisfied that all measures have been undertaken to ensure that the size and scale of the onshore substations are minimised. We will therefore continue to pursue this matter during the examinations and express concerns until such time that our concerns are addressed.
- 7.81 There has also been no movement from the Applicants with regards to the cumulative assessment of the National Grid substation (which will need to be extended to accommodate other projects with offers from National Grid Electricity System Operator (NG-ESO) at Friston) as extended. The Council considers this to be a reasonable ask in this countryside location and will continue to challenge why the Applicants have not taken the opportunity to provide this requested assessment.
- 7.82 Notwithstanding the recommended change in the Council’s overall position which is predominantly moving towards one of neutrality on these two projects, this Council continues to lobby Government to develop a more effective way to manage and coordinate the exploitation of offshore wind and its associated onshore infrastructure in a way that gives greater economies of scale and better protects the environment and local communities. We are actively involved in current and recent consultations being coordinated nationally and regionally to ensure a more co-ordinated approach in the future.
- 7.83 In addition to the above, this report also requests delegated authority to the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development, in addition to the delegated authority provided by Cabinet on 7 January 2020 to negotiate, resolve and agree matters on behalf of the Council arising post-consent. This relates to the Council’s ongoing responsibilities should either or both of the DCO’s applied for by the Applicants be granted by the Secretary of State for BEIS.

Summary

- 7.84 At the time of the EA1N and EA2 Preliminary Meetings the Council maintained the concerns set out in this report as agreed at the Cabinet Meeting held on the 7 January 2020. As part of the considerations to enable that position to be agreed, the Council had regard to the mitigation set out in the Environmental Statements in addition to the compensation measures and MoU outlined in Table 1. This compensation, whilst welcomed, was not considered sufficient to adequately compensate for the impacts of the projects and overcome the Council’s significant concerns.

Mitigation/Compensation Measure	EA1N	EA2
S111 Agreement		
Reduce, offset or compensate for construction impacts along the cable route from the landfall to the substation site including impacts on the AONB.	£120,000	£120,000

Provide further landscape and environmental improvement and enhancement to Friston and its vicinity	£70,000	£70,000
Undertake landscape and environmental measures to reduce, offset or compensate for the construction impacts of the Substation	£75,000	£75,000
Reduce, offset or compensate for longer term operational landscape and environmental impacts of the offshore infrastructure including measures to promote and support the special qualities of the AONB.	£0	£225,000
Contribution towards measures relating to the preservation and enhancement of heritage assets and their settings in Friston and its vicinity.	£200,000	£200,000
Total	£465,000	£690,000
Combined Total	£1,155,000	
Community Benefits Fund	£2.5m (£100,000 p.a. for 25 years)	
Skills, Education and Economic Development MoU	No fixed sum identified	

Table 1 – Key mitigation/compensation measures proposed at the time of 7 January 2020 Cabinet Meeting.

7.85 Since submission of the applications the Government has strengthened its commitment to offshore wind generation, reaffirming the target of 40GW by 2030, announcing the desire that offshore wind will be powering every home in the country in ten years and pledging £160m to help upgrade ports and factories with the aim to create 2,000 jobs in construction and support a further 60,000. The Prime Minister’s ten point plan and Energy White Paper also illustrate the ambition for a green recovery of the economy after Covid-19. As stated in paragraph 1.7, we recognise the importance economically of this industry to local ports and particularly towns of Lowestoft and Great Yarmouth. EA1 awarded a 30-year contract worth £25m and a further £45m in construction contracts to companies within 9 miles of Lowestoft. Jobs opportunities were created during the offshore and onshore construction period but also in relation to the O&M requirements. The EA1 MoU also secured commitments from SPR to support skills development, which included:

- Sponsoring Science, Technology, Engineering and Mathematics (STEM) events.
- Promoting careers in the offshore wind sector and STEM subjects to students in East Anglia.
- £200,000 to fund Masters Scholarships in engineering and environmental sciences.
- Working with East Coast College to support the Offshore Wind Skills Centre and sponsor students through programmes.

7.86 The Council recognising from the experience of EA1 that the projects have the potential to bring significant economic and skills benefits to East Suffolk. These benefits are considered especially important given the current challenges in the economy.

7.87 In the intervening months, following constructive negotiations with SPR the Council has now been presented with an improved set of mitigation/compensation measures in addition to further information/clarification on a number of matters. When these measures are taken collectively, they are considered sufficient to enable a recommendation to be presented which allows the Council to remove its objection to the overall impact of the onshore substations. The enhanced offer is set out below in Table 2. However, the Council still has significant concerns with the likely noise impact in the vicinity of the substation, the cumulative impacts of additional proposals coming forward nearby and regarding the design of the substations. The Council is committed to working with the Applicants and others to seek the best outcome to these proposals if the Secretary of State were to consent these schemes. The Council acknowledges the benefits of providing more offshore wind capacity to meet national requirements and East Suffolk Council needs to be a positive part in that process. However, this is not at any price and we will seek to get the best package available to offset harm.

New Mitigation/Compensation Measure	EA1N	EA2
S111 Agreement		
Sums to support ecological, landscape and habitat enhancements, improve the public rights of way network and strengthen existing qualities of AONB in Landfall to substation area.	£200,000	£200,000
Sums to undertake landscape, environmental, access and amenity enhancements within 1.5km of the substation.	£177,500	£177,500
Sums to provide further landscape. Environmental, access and amenity improvements and enhancements to Friston and its vicinity.	£75,000	£75,000
Sums for measures to support access, environmental and ecological enhancements to the AONB.		£465,000
Contribution towards measures relating to the preservation and enhancement of heritage assets and their settings in Friston and its vicinity.	£200,000	£200,000
Sums to administer the fund	£44,250	£44,250
Total	£696,750	£1,161,750
Combined Total	1,858,500	
Environmental Exemplar MoU	£250,000	£250,000
Tourism Fund	£150,000	
Community Benefits Fund	£2.5m (£100,000 p.a. for 25 years)	

<p>Modifications to project design and mitigation:</p> <ul style="list-style-type: none"> • Reduction in the size of the EA1N and EA2 onshore substations from 190m by 190m to 170m by 190m. • Reductions in the maximum height of the substation infrastructure and lowering of finished ground levels of the eastern substation and National Grid substation. • Adoption of adaptive aftercare and maintenance in relation to the mitigation planting around the substation. • Additional mitigation planting at the substations site • Further details of early planting at the substations site. • Commitment that the ducting for the second project will be laid at the same time as the cabling for the first. • Provision of a National Grid substation design principles Statement • Commitment to provide planted hurdles • Reduced maximum cable corridor width in area of woodland west of Aldeburgh Road, Aldringham • Submission of Outline Landfall Construction Method Statement • Update to Outline Code of Construction Practice • Reduction in the height of the offshore turbines from 300m to 282m 		
Air Quality - Contribution to monitoring and mitigation at the Stratford St Andrew AQMA.	Final sums still to be agreed	
Highways - Funding of a traffic light solution to the A12/A1094 junction to improve road safety.	Final cost not yet known	
Skills, Education and Economic Development MoU	No fixed sum identified	

Table 2 – Key mitigation/compensation measures now proposed.

8 OTHER OPTIONS CONSIDERED

- 8.1 The Cabinet could vary the response proposed in the recommendations and retain the current position agreed at the 7 January 2020 Cabinet meeting.

9 REASON FOR RECOMMENDATION

- 9.1 As statutory consultee in the NSIP process for EA1N and EA2, the Council has been carefully scrutinising the information on the projects as submitted and continues to challenge the Applicants on specific areas in order to affect change where appropriate (i.e. reducing the scale and massing of onshore infrastructure to minimum levels possible to reduce adverse impacts and challenging noise levels and resulting impacts from the onshore substation sites). The Council will continue to seek amendments to the projects to address our remaining concerns but in doing so the Council acknowledges the potential these schemes and others have in meeting national climate change/energy opportunities.

RECOMMENDATIONS

1. That the Cabinet is recommended that in negotiation with the Applicants on statements of common ground and in responses to the Planning Inspectorate/Examining Authority that East Suffolk Council continues to support the principle of offshore wind as a significant contributor to the reduction in carbon emissions and for the economic opportunities that they may bring to ports in the NALEP geography that could support the construction and maintenance of the windfarms. Notwithstanding this, the Council:
 - a) Is neutral in relation to EA2 and the predicted offshore effects of the proposal on seascape, coastal landscapes, character and qualities of the AONB and cumulatively with EA1N due to the amendments made to the offshore wind turbine heights and provision of compensation.
 - b) Is moving towards a predominantly neutral position in relation to the overall impact of the onshore substations on EA1N and EA2 individually and cumulatively on the village and environs of Friston. The Council acknowledges that the onshore infrastructure is out of character with the village but recognises that the Applicants are seeking to provide embedded mitigation as part of their project which coupled with the mitigation and compensation packages proposed will enable the Council working with partners to provide additional improvements in addition to the embedded project mitigation.
 - c) Maintains significant concerns with regards to the impact of operational noise levels at the onshore substations site which will have an adverse impact on residential amenity and the character of the area until such time that appropriate and suitable mitigation or compensation is secured.
 - d) Maintains significant concerns with regards to the lack of cumulative assessment of the National Grid substation in its extended form, until such a time as this is considered to be adequately and appropriately addressed.
 - e) Maintains concerns with regards to the design of the onshore substations until such time that the Council's concerns are adequately and appropriately addressed.

- f) Accepts the additional provision pledged with regards to: revisions to the A1094 junction with the A12 which will significantly improve road safety at this junction which is welcomed; a contribution to air quality monitoring/mitigation of the Stratford St Andrew AQMA; a contribution to a Tourism Fund to provide additional marketing of East Suffolk in conjunction with the Suffolk Coast Destination Management Organisation and the commitment to lay ducting for the second project at the same time as the cabling for the first if they are constructed sequentially.
 - g) Accepts the s111 funds which will enable the provision of compensatory measures to help offset the impacts of the projects.
 - h) Accepts an environmental exemplar fund to support ambitious aims to improve biodiversity and drive the decarbonisation of energy used in homes and travel.
 - i) Will continue to engage with the Applicants to seek to address the matters of concern raised in the Relevant Representation and Local Impact Report and will raise these matters of concern during the examination as appropriate.
2. That authority be delegated to the Head of Planning and Coastal Management, in consultation with the Deputy Leader and Cabinet Member with responsibility for Economic Development to revise the Council's position on the projects if the matters of concern are adequately and appropriately addressed.
 3. Should the DCOs for EA1N and/or EA2 be granted by the Secretary of State for BEIS, Cabinet is recommended to delegate authority to the Head of Planning and Coastal Management, in consultation with the Deputy Leader and Cabinet Member with responsibility for Economic Development to:
 - Discharge requirements of granted DCOs.
 - Facilitate the Council's responsibilities under any Section 111/Memorandum of Understanding/agreement.
 - Consider and respond to any minor revisions to the DCOs proposed.