

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Historic England's Deadline 4 Submissions

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



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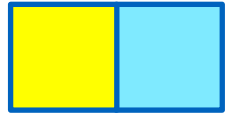


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Glossary of Acronyms

DCO	Draft Development Consent Order
ES	Environmental Statement
HE	Historic England
NGET	National Grid Electricity Transmission
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO project / East Anglia ONE North project.



Projects	The East Anglia TWO Offshore Windfarm and the East Anglia ONE North Offshore Windfarm.
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1 Introduction

1. This document presents the Applicants' comments on Historic England's (HE) Deadline 4 submissions (REP4-079) as follows.
2. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.



Table 1 Applicants' Comments on HE Deadline 4 Submission

Reference HE Comment		Applicants' Comment
Proposed Changes to the Order Limits and Additional Land required (EA1N and EA2)		
001	We can confirm we have no comment in relation to the revised order limits and additional land required, provided that should consent be granted they would be subject to the same archaeological conditions as set out in the draft DCO and detailed via the on and offshore WSI.	Noted
Revised DCO: (EA1N and EA2) Document Reference: 3.1 (Tracked) EA1N and EA2 and Schedule of Changes to the draft Development Consent Order		
002	We can confirm we have considered the amendments in relation to the historic environment and have no comment in relation to the revisions to the DCO.	Noted
Revised SoCG		
003	Following a meeting with the applicant in December further progress has been made on the SoCG, however a number of items are still under review and a further revision is expected by 3 rd Feb 2021 (Deadline 5).	An updated Statement of Common Ground (SoCG) with HE for offshore matters has been submitted at Deadline 5 (document reference ExA.SoCG-6.D5.V4). The Applicants note that all matters within the HE SoCG (offshore) are agreed subject to HE review of the updated draft DCO submitted at Deadline 5. The Applicants anticipate a SoCG with HE for onshore matters will be submitted at Deadline 6.
Revised SoCG On- and Off-shore Written Scheme of Investigation		
004	Historic England have committed to returning comments on the changes that have been made to both the DRAFT WSI documents (On and Off-shore) to the applicant and ExA by 3 rd Feb 2021 (Deadline 5).	Noted.



Reference HE Comment	Applicants' Comment
Revisions to the DCO including updated photomontages and clarification notes	
<p>005</p> <p>Following a discussion and meeting with the Applicant in December, Historic England have been made aware that the applicant has committed to changes to the overall design of both of the sub stations for EAIN and EA2, as well as modification to the landscape layout. These are changes that have been made to the draft DCO and are set out in various document including the Onshore Substations Update Clarification Note and in Deadline 3 Project Update Note (dated 15th December 2020).</p> <p>Historic England understands the maximum height of buildings within the onshore substations would be reduced to 14m, external electrical equipment reduced to 14m, and lightning protection masts to 20m above the finished ground level. In addition the applicant has indicated there will be up to a 2.0 m reduction in the finished ground level.</p> <p>We note there are corresponding changes to the OLMP and OLEMS documents (Revised chapter 8.7). These changes can be considered as a reduction of the onshore substation footprint to 190m x 170m which pushes the western boundary of the western substation some 40m to the east and will result in the retention of the existing 'covert' woodland, movement of NGET SuDS basin eastwards, additional planting to the north of the substations, particularly in the areas around the sealing end compounds, the addition of planting alongside field boundaries to the north of Friston, additional individual tree planting and updates to planting associated with the PRoW diversions.</p> <p>In order to consider the changes the applicant has also provided a number of revised visualisations and these include Viewpoints 1 and 9, Cultural Heritage Viewpoints 3, 4, and 5, and a clarification note.</p>	<p>The Applicants can confirm that this is correct.</p>



Reference HE Comment		Applicants' Comment
006	<p>Historic England Advice</p> <p>Historic England notes these changes and we are pleased that the applicant has set out to make amendments, has committed to these changes, and has provided the additional information.</p>	Noted
007	<p>We are very concerned that these changes have been presented very late in the day, with insufficient time for full consideration. The timetable allowed to consider these changes has been very short and given the new COVID restrictions and the Christmas leave period we have not been able to visit site to verify the findings. We cannot therefore be definitive in our advice. Likewise the new information, particularly the viewpoints, present only a snapshot of the likely effects. This perhaps would have been better presented as a discreet addendum to the ES.</p>	<p>The Applicants appreciate HE's concerns regarding the timing of the notification of these amendments.</p> <p>The Applicants would highlight that these amendments have been made following post-application consultation with a number of stakeholders and the supply chain and they seek to address a number of issues spanning several receptor topics. Following further consultation and engineering input, the proposals were submitted to the Examination as early as possible.</p> <p>The Applicants refer HE to the Heritage Assessment Addendum and Appendices (REP4-006 – REP4-012), which provide an update of the assessment in light of these changes.</p> <p>The Applicants will discuss the material submitted at Deadline 4 with HE and provide any clarification required.</p>
008	<p>That said, viewpoint 9 perhaps illustrates best that there will be some reduction in overall visibility of the scheme in longer range views particularly from the south of the village and that these changes would result in a lessening of the overall visual impact.</p>	Noted. The Applicants welcome this position.
009	<p>Views of the church from the north will still however be obliterated as illustrated (CHVP4), and in spite of the changes the loss of the footpath will continue to lead to a change to the relationship between the church and this land to the north. We not feel it is necessary to repeat the case we have presented with regards to the important contribution this area of</p>	<p>The Applicants refer HE to the Heritage Assessment Addendum and Appendices (REP4-006 – REP4-012), which provide an update of the assessment in light of these changes.</p>



Reference	HE Comment	Applicants' Comment
	land to the north of the church makes to the significance of the church, and how it is experienced in this landscape. Our position remains consistent with that presented in previous advice from 2018 onwards.	
010	We likewise note the increased offer in relation to the OLMO and OLEMS, which includes retention of woodland and increased planting. All of which are welcomed. To some extent we are aware that the clarification with regards to the reduction in the footprint, the overall height and finished ground heights will increase the likely chance of success that the proposed mitigation would be effective in historic environment terms i.e. that the planting would be successful in providing mitigation against the harm caused by the development.	Noted. The Applicants welcome this position.
011	<p>We also note the applicants approach to mitigation and screen planting has been further amended but-as voiced by the Council- we remain sceptical about the growth rates and consider the efficacy of the planting is optimistic. This has to remain a concern for Historic England. As we have said previously this is not an area of expertise for us and we are therefore reliant on the expertise that others have in this specialism and this geographic area. The issue remains that should the application be granted then mitigation would need to be deliverable in order to be effective at reduced the clear and demonstrable harm to the historic environment.</p> <p>We therefore consider the amended proposal would result in a minor improvement in the proposed landscape and screen planting, and as a result in the retention of existing woodland.</p>	<p>The growth rates used in the Applications were determined by a Landscape Architect based on relevant guidance from the Institute of Environmental Management and Assessment, research of published literature and plant nurseries. They are comparable to precedents established by other nationally significant infrastructure projects.</p> <p>Soils at the onshore substation locations tend to be slightly acidic but base-rich loamey and clayey (loam to clayey loam). The soils here are likely to be fertile and conducive to good plant growth. The landscape surrounding the substation locations demonstrates the ability of trees and woodland to establish and grow to maturity in these soils and climate.</p> <p>Section 4.2 of the Outline Landscape and Ecological Management Strategy (REP3-030) submitted at Deadline 3 includes proposals for adaptive / dynamic landscape management measures at the onshore substation locations to assist in promoting the growth of landscape planting. The final LMP will include provision for the implementation of adequate watering of newly planted and established trees during the aftercare period. The Applicants can also commit to the replacement of</p>



Reference HE Comment		Applicants' Comment
		failed woodland planting at the onshore substation location for a period of ten years in line with the DCO.
012	We would also continue to raise concerns about the location of the two western most sealing end compounds, which still appear to crash into the landscape rather than be placed with care, so as to avoid impacts upon historic field boundaries and features. This is something that is in the control of the applicants and could be addressed for the next deadline.	The Applicants discussed this matter with HE on 27 th January 2021. National Grid Electricity Transmission (NGET) are aware of the sensitivity of this matter but it is noted that the final design and micro-siting of the cable sealing ends can only be decided during the detailed design stage and are influenced significantly by electrical design and safety constraints however the matters raised by HE will be taken into account during the final design process.
013	As set out previously and given we raised concerns about the scheme in 2018 (see Historic England Deadline 3 response) we have to ask why has it taken so long to see clarifications with regards to these effects. Can the applicant commit to further reductions before the next deadline and can the impact of the scheme be reduced further.	See the Applicants' response to row 007 above. The Applicants have engaged with the supply chain from very early in the development process. This engagement fed into the design envelope considerations for the Applications and into the refinements made since submission. Post-consent, the Projects will go through a detailed design process where further refinements may be achieved in terms of the height of onshore substation buildings and equipment. Similarly, fences and infrastructure around the perimeter will undergo a formal design process where further reductions in scale may also be achieved.
014	We note for example that there is no clarification with regards to the NGET substation and additional information is sought. This issue remains disappointing and an area of overall concern for us.	From discussions with NGET the Applicants understand that it is unlikely that the footprint of the NGET substation will substantially change. Although there may well be opportunities for micro-siting aspects of infrastructure.
015	Historic England Position We have previously concluded that the development of the sub-stations both individually and in conjunction with each other and with the NGET sub-station would result in harm to the historic environment. This is harm	Noted. See the Applicants' response to row 009 above.



Reference	HE Comment	Applicants' Comment
	<p>to the significance of a number of designated heritage assets from development within their setting, and through a major industrial and alien development within their immediate rural landscape context. Primarily though, our concerns are with the grade II* listed church of St Mary's, Friston, because of the important relationship of the development area to the church and the erosion of its rural setting. This would be a high degree of less than substantial harm.</p>	
016	<p>Overall, we accept this new approach would result in some limited positive change to the scheme and these changes have the potential to result in a reduction in the overall level of harm. Particularly in the longer range views of the church and village from the south.</p>	<p>Noted. The Applicants welcome this position.</p>
017	<p>The scheme would, however, still result in the removal of the historic northern route way which appropriates and illustrates the role of this landscape in the appreciation of the more modest, humble and historic church. The changes would not reduce the overall impact in views from the north, which although potentially lessened would still result in views of the church being obliterated. In our view, although the changes are welcome, they would only result in a minor reduction in the level of harm to the historic environment.</p>	<p>Noted. The Applicants welcome HE's position that the level of harm has been reduced through the changes made.</p>
018	<p>Conclusion</p> <p>Overall, the church at Friston remains one of the key buildings in the community and over many centuries the church has played a key role in the life of the parish. The visual impact of the scheme is only one level of harm and these changes, although welcomed, do not in our view alter the impact of the overall development on the significance to the north of the Grade II* Church. Although we welcome the changes, Historic England do not consider this is sufficient to change our overall position and we</p>	<p>The Applicants welcome the HE position that the amendment made to the onshore substation design would reduce the visual impact of the proposals from a heritage settings perspective.</p> <p>Regarding the overall level of impact on Friston Church, the Applicants refer HE to the Heritage Assessment Addendum and Appendices (REP4-006 – REP4-012)</p>



Reference	HE Comment	Applicants' Comment
	<p>maintain our in principle objection to the sub- station elements of both developments. This would be a high degree of less than substantial harm.</p> <p>If there are any further material changes to the proposals, or you would like further clarification in relation to our advice, please contact us.</p>	