



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on SASES' 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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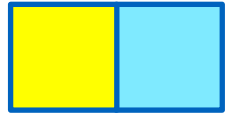


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Glossary of Acronyms

AIL	Abnormal Indivisible Load
AMP	Access Management Plan
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
EA1N	East Anglia ONE North
EA2	East Anglia TWO
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
ESDAL	Electronic Service Delivery for Abnormal Loads
ExA	Examining Authority
HFoV	Horizontal Field of View
HGV	Heavy Goods Vehicle
HVAC	High Voltage Alternating Current
IEMA	Institute of Environmental Management and Assessment
kV	Kilovolt
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LCV	Light Commercial Vehicle
LMP	Landscape Management Plan
LVIA	Landscape and Visual Impact Assessment
mph	Miles Per Hour
MW	Mega Watt
NGET	National Grid Electricity Transmission
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
NSIP	Nationally Significant Infrastructure Project
OAMP	Outline Access Management Plan
OcoCP	Outline Code of Construction Practice
OCTMP	Outline Construction Traffic Management Plan
OLEMS	Outline Landscape and Ecological Management Strategy
OLMP	Outline Landscape Management Plan
OS	Ordnance Survey
OTP	Outline Travel Plan
PINS	Planning Inspectorate
PRoW	Public Rights of Way
RAG	Red Amber Green
SASES	Substation Action Save East Suffolk
SCC	Suffolk County Council
SoCG	Statement of Common Ground
SPR	ScottishPower Renewables
SuDS	Sustainable Drainage Systems
SZC	Sizewell C



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
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 substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.



Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.



1 Introduction

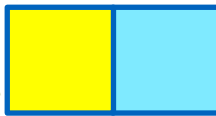
1. The Applicants' responses to comments received from Substation Action Save East Suffolk (SASES) for the East Anglia ONE North project and the East Anglia TWO project ('the Projects') are provided in **Section 2** below for the following topics:
 - Landscape and Visual;
 - Traffic and Transport;
 - Onshore Ecology;
 - Public Rights of Way;
 - Sizewell Mitigation Land;
 - Design;
 - Cultural Heritage;
 - Flood Risk;
 - Response to Hearing Action Points (ISH1, CAH1, ISH2);
 - Noise; and
 - Draft Development Consent Order (DCO).

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 (ExA) 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.

2 Comments on SASES' Written Representations

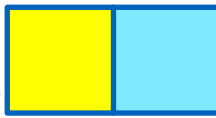
2.1 Landscape and Visual

ID	Written Representation	Applicants' Comments
Outline Landscape and Ecological Management Strategy REP3-030		
1	30. Please see comments from Michelle Bolger, Expert Landscape Consultancy, in Landscape Briefing Note 5 attached at Appendix 1, pages 6 & 7.	The Applicants have responded to comments from Appendix 1, pages 6 and 7 below.
2	31. Paragraph 76 (page 23) states:- <i>'The OLMP should be designed in order to accommodate any future development of the National Grid substation to accommodate future projects, without modification to the final LMP, such as the removal of planting provided by the proposed East Anglia TWO project.</i> <i>It is important that the OLMP delivers more than just planting with a sole screening function. The site is surrounded by public footpaths, hosts wildlife and is currently enjoyed by the surrounding communities and therefore the masterplan should deliver significant gains for biodiversity and public amenity'.</i>	The Outline Landscape Mitigation Plan (OLMP) has been designed to mitigate the effects of these Projects by providing a comprehensive approach and will deliver gains for biodiversity and public amenity, as described in the Outline Landscape and Ecological Management Strategy (OLEMS) (REP3-030). This includes additional planting to increase visual amenity for users of the extensive Public Rights of Way (PRoW) network.
3	32. It should be noted that the first paragraph above envisages future development of the National Grid substation. The second paragraph commits to significant gains for biodiversity and public amenity, which the Applicant has said it is not obliged to deliver. There are no gains,	



ID	Written Representation	Applicants' Comments
	significant or otherwise, for biodiversity at the substation site and as far as public amenity is concerned there are only significant losses.	
4	<p>33. Paragraph 87 states:</p> <p><i>'If the National Grid GIS substation is adopted, the LMP will be prepared based on the GIS layout and take advantage of the reduced footprint that a GIS solution provides. This demonstrates that the Applicant is fully aware that a GIS option would release further land for potential development and supports the statement made in Paragraph 76 above.'</i></p>	<p>The Applicants refer to the Gas-Insulated Switchgear (GIS) OLMP in Figure 9 of the OLEMS (REP3-030) which is prepared based on a National Grid GIS substation.</p>
5	<p>34. Paragraph 151 refers to the planting of hedgerows along the permanent access road but with the proviso <i>"The Landscaping in the area around the bends of the access road must accommodate for any oversail of Abnormal Indivisible Load deliveries to the onshore substations. Refinements will continue to be made to the planting in these specific areas, details of which will for part of the final LMP prepared post-consent."</i></p> <p>There are three bends shown on the OLMP, all of which are shown with hedgerow planting. It is misleading for the OLMP to include this hedgerow planting when in all likelihood it will not be possible to plant in this location, especially on the tight right-angle bends near the substations.</p>	<p>The Applicants can confirm that the hedgerow planting offset around the bends of the access road, shown in Figure 3 of the OLEMS (REP3-030), accommodates for any oversail of Abnormal Indivisible Load (AIL) deliveries to the onshore substations.</p>
6	<p>35. New paragraphs 174 – 179 suggest two areas comprising Work Nos 28 and 29 east of Grove Road where the Applicant has identified ecological mitigation opportunities. Both Work Nos 28 and 29 are stated to be provisional if a requirement for ecological mitigation is needed post-consent as a result of pre-construction surveys. It is therefore incorrect to present these areas on the OLMP as mitigation areas when they are only seen by the Applicant as provisional. Mitigation for the loss of suitable habitats on the substation site must be provided as a certainty in the DCO</p>	<p>For clarity, Work No. 29 is a potential ecological mitigation area south of Grove Wood and Work No. 28 is a potential ecological mitigation area at Long Covert. Neither of these are presented within the OLMP. However, the Applicants retain the rights within the draft DCO (REP3-011) to implement ecological mitigation within these areas if required.</p>

ID	Written Representation	Applicants' Comments
	and be created pre-construction. This particularly applies to suitable habitats for bats, badgers and birds displaced on the substation site.	
7	36. Paragraph 185 – See response to Row 59 in the Applicants' Responses to SASES Deadline 1 submissions regarding veteran trees.	Noted.
8	37. Paragraph 212 states that "Friston Beck is not considered further within this OLEMS as it is not considered to be of ecological value". As the Applicant is proposing to discharge surface water into the Friston Watercourse, an ecological survey should be carried out in order to ascertain its true ecological value. For example it is known that bats enter the culvert at Grove Road and this culvert should be properly surveyed along its entire length.	<p>Friston Beck was considered to be of low ecological value due to it being shallow and narrow (section 22.5.2.9 of Chapter 22 Onshore Ecology (APP-070)). The culvert at Grove Road is outside of the Order limits and will therefore not be directly affected.</p> <p>As set out in the Outline Operational Drainage Management Plan (REP3-046), the Applicants have committed to retaining the pre-development greenfield run off rate and therefore the culvert at Grove Road will not be subject to increased flow rates. Together with the measures set out in the Outline Code of Construction Practice (REP3-022), any indirect effects will be minimised. The Applicants therefore do not consider it necessary to undertake further monitoring at this location.</p>
9	38. Annex 1: Hedgerows Schedule – The Applicant is asked to explain what is meant by "Landscape Mitigation" in respect of Hedgerows 38 to 50 as these are shown for removal on Sheet 7 of the Important Hedgerows and Tree Preservation Order Plan.	<p>It is noted that the draft DCO (REP3-011) and accompanying Important Hedgerows and Tree Preservation Order Plan (REP3-010) provide the rights to remove all or part of the specified hedgerows. However, any works to hedgerows must be undertaken in accordance with the final landscape management plan. The final landscape management plan must accord with the OLEMS (REP3-030) and be submitted to and approved by the relevant planning authority prior to the commencement of onshore works.</p> <p>In respect of hedgerows 38 – 50, categorised as landscape mitigation within the OLEMS, it is anticipated that only small sections may require</p>



ID	Written Representation	Applicants' Comments
		removal to facilitate the required construction works and landscaping. The Applicants refer to ID1 within Section 2.3 Onshore Ecology .
10	39. Section 3.5.13 Public Rights of Way - Paragraph 149 – This paragraph has been amended from the proposals that the “permanent diversions will be completed by the end of the construction phase” to “the proposed permanent diversions will be in place prior to the existing PRoW being stopped up”. No explanation is given as to what PRoWs will be available to the public during the construction phase despite the Applicants’ confirmation in their response to SASES Deadline 1 submissions Row 04-07 that it does not intend to keep FP6 open during the construction phase. The omission to explain how the PRoW network on the substation site will function during the construction phase is unacceptable and the Applicant should be asked to clarify the situation fully prior to DCO consent.	For clarity, the Temporary Stopping up of Public Rights of Way Plan (REP3-008) and Outline Public Rights of Way Strategy (REP3-024) provides information on PRoW available to the public during construction of the Projects.
11	<p>40. In summary:</p> <ul style="list-style-type: none"> • Hard surfacing to the proposed alternative PRoW on the substation is inappropriate. • The Applicant must clearly explain how the PRoW network on the substation site will function during the construction phase, including the timing of the stopping up of FP6 and the creation of the new alternative PRoW to the satisfaction of the local authority. • More detail is required on how the reduction of levels on the site and creation of CCSs will interact with the proposed alternative PRoW. 	
Landscape Briefing Note 5		
12	Project Updates	The Applicants confirm that this is correct.

ID	Written Representation	Applicants' Comments
	<p>1. The Project Update (EN010077-003304-ExA.AS-6.D3.V1 EA1N&EA2 Deadline 3 Project Update Note) and the accompanying Clarification Note (EN010077-003309-ExA.AS-11.D3.V1 EA1N&EA2 Onshore Substations Update Clarification Note) set out:</p> <ul style="list-style-type: none"> • some reduced heights for buildings and structures; • proposed finished ground levels although these have not yet been subject to detailed studies; and • maximum AOD heights. 	
13	<p>Reduced heights for buildings and structures</p> <p>2. Whilst reduced heights for buildings and structures are welcome, it is noted that it is one of the smaller buildings and the slenderest of the structures that have had the greatest reductions. The GIS building which is the largest building/ structure on site has only been reduced in height by 1m and the Super Grid Transformers and associated equipment have remained at 10m. the reduction in the Harmonic Filters from 18 to 14m in height is the most visually noticeable reduction.</p>	<p>The Applicants note that the reduced heights for buildings and structures is welcomed and highlights the Comparison of Onshore Substation Equipment / Building Parameters in Table 4.2 of the Onshore Substations Update Clarification Note (REP3-057), which sets out these commitments.</p>
14	<p>3. Unfortunately, in terms of understanding how these changes will affect visibility a direct comparison between the previous photomontages and the revised scheme is not possible. This is because in addition the change listed in the Project Updates Notes the layout of the substations has been completely revised, and the information about the new layout is limited and difficult to interpret as set out in the following paragraph.</p>	<p>The combination of reduced footprints and lowered ground levels has necessitated a minor rearrangement of the onshore substation layout. Plate 5.1 and Plate 5.2 of the Onshore Substations Update Clarification Note (REP3-057) provide a comparison of the substations layouts used with the Applications and that based on the updates presented in this clarification note.</p> <p>The Applicants have produced updated photomontages at Deadline 3 (Updated Photomontages Clarification Note (REP3-062)) and Deadline 4 in its Landscape and Visual Impact Assessment Addendum (REP4-031) which allow direct comparison to be made with</p>

ID	Written Representation	Applicants' Comments
		the photomontages in Figure 29.13 to Figure 29.26 of the Environmental Statement (ES) (APP-404 to APP-417).
15	4. Page 15 of EN010077-003309-ExA.AS-11.D3.V1 EA1N&EA2 Onshore Substations Update Clarification Note includes Plate 5.2: 3D model of the updated easternmost onshore substation showing reduced footprint and building / equipment parameters. A model showing both substations would be useful because previously it had been indicated (in the submitted OLMP General Arrangement drawing, Figure 3) that the substations would be 'mirrored' rather than repeated.	The Applicants can confirm that the substation layout 3D model for the westernmost substation is a 'mirrored' version of that shown for the easternmost substation in Plate 5.2 of the Onshore Substations Update Clarification Note (REP3-057). The geo-referenced arrangement and 'mirrored' orientation of the onshore substations is shown in Figure 3 OLMP General Arrangement of the OLEMS (REP3-030).
16	5. Plate 5.2 does not provide any indication of the orientation of the eastern SPR substation. It is only possible to understand the orientation by reference to the revised OLMP General Arrangement drawing, Figure 3. This shows the Super Grid Transformers and associated equipment located along the north west facing edge of the substation. Assuming this represents the orientation of the eastern substation, Plate 5.2 would be more easily understood if it was rotated 90o clockwise so that the top corner of the model represented the northernmost point of the eastern substation. It has also been inferred from the OLMP General Arrangement drawing that the western SPR substation continues to be a mirror of the eastern substation.	The Applicants can confirm that the substation layout 3D model for the westernmost substation is a 'mirrored' version of that shown for the easternmost substation in Plate 5.2 of the Onshore Substations Update Clarification Note (REP3-057). The geo-referenced arrangement and 'mirrored' orientation of the onshore substations is shown in Figure 3 OLMP General Arrangement of the OLEMS (REP3-030).
17	6. On this understanding I assume 'access road' means the access point into the substation. There are two external access roads to the eastern SPR substation, one along the north west facing edge and one along the south west facing edge (the edge facing the western SPR substation). The access point is from the latter. It is not clear why the external access road along the north western edge of the eastern SPR substation is required at all.	The layouts presented remain subject to detailed design as previously confirmed by the Applicants. The precise arrangement of the operational substation access road is yet to be determined, however must be designed in accordance with the Works Plans and any constraints within the draft DCO (REP3-011).

ID	Written Representation	Applicants' Comments
18	<p>7. In order for a proper consideration of the implications of the Project Updates to be undertaken the Appellant needs to provide a detailed/labelled plan showing all substations on a base map. It would be helpful if the Appellant provided the 3D model of the substations used in the photomontages.</p>	<p>The geo-referenced arrangement and orientation of the onshore substations is shown in Figure 3 OLMP General Arrangement of the OLEMS (REP3-030).</p>
19	<p>8. In the revised photomontage from Vp 2, Friston Church Road, the reduction in the height of the Harmonic Filters results in an improvement. The reorganisation of the elements within the substations, in particular the Super Grid Transformers and associated equipment, has also resulted in an improvement with regard to visual intrusiveness, although we assume these elements have not changed in height as no height reduction has been mentioned. It is the Super Grid Transformers and associated equipment within the western SPR substation that are most visually intrusive in the originally submitted Vp 2 and we do know that there has been no reduction in their ground level. As the layout of the substations is not currently a controlled element of the DCO any improvement as a result of the rearrangement of equipment cannot be relied upon. If a specific arrangement is being relied upon to reduce visual intrusiveness there needs to be a specific requirement with regard to the layout. For example, any changes from the layout used for the photomontages would need to be subject to a demonstration, such as through revised photomontages, that the changes did not increase the visibility of elements within the substations.</p>	<p>The Applicants welcome the recognition that there is an improvement and reduction in visual impact in Viewpoint 2, Friston Church Road. The Applicant agrees that the reduction in the height of the Harmonic Filters contributes to this reduction in visual impact. As noted above at ID13, the revised maximum height of the Super Grid Transformers is 10m, compared to 18m as the original parameter within the Applications (on which photomontages were based), which makes a notable contribution to the reduction in visual impact.</p> <p>Updated details of finished ground levels are provided in the Onshore Substations Update Clarification Note (REP3-057).</p> <p>The Applicants have produced updated photomontages at Deadline 4 in its Landscape and Visual Impact Assessment Addendum (REP4-031).</p>
20	<p>Finished ground levels</p> <p>9. It is welcome that we have at last been provided with the finished ground levels used in the photomontages. Although the eastern SPR substation is to be reduced by 2m this is the SPR substation furthest from the most sensitive receptors; Friston village and its residents and the</p>	<p>The Applicants consider that lowering the ground levels of the westernmost onshore substation (by 2m) and the National Grid substation (by 0.7m) will contribute to a reduction in visibility and the resulting visual effects, particularly for the easternmost onshore substation. The Applicants have provided updated photomontages and</p>

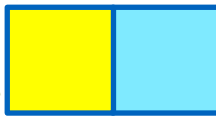


ID	Written Representation	Applicants' Comments
	<p>historic farmhouses situated to the north and west of the substations. There is no proposed reduction for the western SPR substation, and the NG substation is only reduced by 0.7m which will have a negligible effect. Controlled maximum AOD heights are to be welcomed.</p>	<p>assessment in its <i>Landscape and Visual Impact Assessment Addendum</i> submitted at Deadline 4 (REP4-031), which shows the landscape and visual benefits of the commitment to a reduced above ordnance datum (AOD) height of the buildings and external electrical equipment, and which is achievable due to refining the finished ground levels and building/equipment height reductions.</p>
21	<p>10. It is not clear that the difference evident in the revised photomontage from Vp 9 is a result of the reduction in ground level or the reduced building heights, although the reduction in height of the Harmonic Filters is beneficial. However, the most noticeable change here also appears to be as a result of the new arrangement, in particular the relocated Super Grid Transformers and associated equipment. As set out above the precise layout of the substations is not currently controlled by the DCO and so any resulting improvement cannot be relied on.</p>	<p>The Applicants have provided updated photomontages and assessment in its <i>Landscape and Visual Impact Assessment Addendum</i> submitted at Deadline 4 (REP4-031), which illustrate and assess changes in the view from Viewpoint 9 B1121 Aldeburgh Road, south of Friston (<i>Figure 29.21-Update</i>) (REP3-065). The combination of the project design updates, including the relocation in the footprint of each of the onshore substations, lowering of the finished ground levels and maximum heights of the infrastructure has notably reduced the amount of the Projects' onshore substation buildings and external equipment visible in the view from the southern area of Friston and on approaches to the village from the south, such as in the view from Viewpoint 9 - B1121 Aldeburgh Road, south of Friston (<i>Figure 29.21-Update</i>).</p>
22	<p>11. Section 3 of the Clarification Note, sets out the implications of the proposed reduction in finished ground levels. This reveals that the finished ground levels proposed in the ES would have required 78,782m³ of fill to be imported, equating to nearly 4,000 HGV Movements. I do not consider that this information has been clearly provided to date. It is difficult to understand why this level of imported fill could ever have been proposed. This is not a change that has been arrived at through 'engagement with the supply chain'.</p>	<p>The figures provided in <i>Table 3.2</i> of the <i>Onshore Substations Update Clarification Note</i> (REP3-057) allow a like-for-like comparison of a range of estimated finished ground levels, based on a 'flat' substation finish, as presented within the photomontages submitted with the Applications. It does not take into account detailed design measures, which will be considered to optimise the finished floor levels with the cut and fill requirements of the substations.</p>

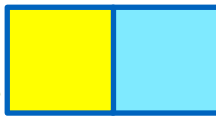
ID	Written Representation	Applicants' Comments
23	<p>12. Only two explanations as to why the scheme as submitted had required the importation of 78,782m³ of fill seem likely. Either the applicant was looking for a location to deposit spoil from elsewhere in the project, or there was a serious failure of design. There has been a lack of evidence throughout the process to show that any detailed work had been undertaken on the design of the onshore substations to minimise their landscape impact as required by EN-1 <i>'to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate'</i>.</p>	<p>As is standard for nationally significant infrastructure projects, detail design is undertaken post consent, ensuring such projects retain the necessary flexibility in their design at the consenting stage whilst establishing the maximum visual envelope in which the environmental impact assessment is undertaken within the Projects' Rochdale Envelope (as recognised in NPS EN-1 (paragraph 4.2.8)).</p>
24	<p>13. We have not seen any detailed modelling of ground levels. To understand the proposed changes, it would be helpful to see the 3D ground models used for both the original photomontages and the revised photomontages.</p>	<p>A comparison of the finished ground levels within the Applications and those now proposed is presented in Table 3.1 of the Onshore Substations Update Clarification Note (REP3-057). This sets out the level on which the original photomontages in the figures accompanying Chapter 29 of the ES (APP-077) are based upon and the revised finished ground levels. 3D model representations used for the photomontages that illustrate the onshore substations and National Grid substation are set within a computer-generated image of the landform, produced with a combination of Autodesk 3D Max and Visual Nature Studio and are based on a terrain model with a 2m data grid (2m LIDAR data) modified to model the finished ground levels of the substations and National Grid substation.</p>
25	<p>Conclusion on Project Updates</p> <p>Whilst the proposed changes to the SPR substations will bring some improvements the development would remain incongruous and out of scale with the receiving landscape. The changes would not be enough to significantly reduce the magnitude of change for either landscape or visual</p>	<p>The Applicants have provided updated photomontages and assessment in its Landscape and Visual Impact Assessment Addendum submitted at Deadline 4 (REP4-031), which illustrate and assess changes in the landscape and visual effects of the substations as a result of the combination of the project design updates.</p>

ID	Written Representation	Applicants' Comments
	effects. Those effects which will remain as major adverse during construction and through Year 1 (potentially a six-year period or longer) only reducing to moderate/major at year 15, based on optimistic assumptions with regard to tree growth rates.	
EN010077-003227-ExA.AS-16.D3.V1 EA1N&EA2 Updated Photomontages Clarification Note		
26	15. It is welcomed that the applicants have finally 'added a baseline photograph at the same size as the photomontage (53.5° field of view) to allow direct comparison, as recommended in Landscape Institute TGN 06/19 (published in September 2019)'. ³ However to date this has only been provided for the 3 LVIA photomontages and the 3 Cultural Heritage photomontages that have been revised. A baseline photograph at the same size as the photomontage should be provided for all photomontages.	The Applicants have provided updated photomontages from eight key LVIA viewpoints are provided in Appendix 1 of the Landscape and Visual Impact Assessment Addendum submitted at Deadline 4 (REP4-031). The Applicant has provided updated photomontages from a further six key Cultural Heritage viewpoints a Deadline 4 at part of the Heritage Assessment Addendum (REP4-006).
27	16. The Updated Photomontages Clarification Note states that advance planting is no longer shown in the revised photomontages. This is welcomed. The misleading impression given by the 'advance' planting can be seen for example by comparing the original CHVp3 and the Revised CNVP3. LVIA Vps 5 and 14 at year 1 are also distorted by the introduction of unreasonably mature 'advance' planting. Of the five viewpoints that included advance planting with optimistic 3-4 years post planting growth (Viewpoints 2, 3, 4, 5 and 14) only Vp 2 is included in the revised photomontages.	The Applicants have provided updated photomontages from eight key Landscape and Visual Impact Assessment (LVIA) viewpoints within Appendix 1 of the Landscape and Visual Impact Assessment Addendum submitted at Deadline 4 (REP4-031), which do not show early planting growth.
28	17. The planting of extra heavy standards (4m at planting) is for the benefit of early screening not long-term growth, as it is commonly accepted that they take longer to establish than whips/ transplants. It is also the case that they are more difficult to establish and therefore more likely to need to be replaced.	The Applicants agree that the planting of extra heavy standards (4m at planting) within a selection of field boundaries to the north of Friston is for the benefit of early screening. The Applicants propose to prepare a Landscape Management Plan (LMP) based upon an adaptive management scheme (dynamic aftercare), which will ensure adequate landscape aftercare supervision for these extra heavy standard trees.

ID	Written Representation	Applicants' Comments
		<p>The Applicants can commit to the replacement of failed planting at the onshore substation location for a period of ten-years in line with the draft DCO (an updated version has been submitted at Deadline 5, document reference 3.1).</p>
29	<p>18. Whilst it is welcomed that, following comments from the Councils, the unrealistic trunks and branch structures have been replaced in the trees shown on Viewpoint 2, the unrealistic heights have been maintained.</p>	<p>The Applicants address the issue of growth rates in some detail in the Updated Photomontages Clarification Note (REP3-062) submitted at Deadline 3, particularly in Section 3.1.4.</p> <p>The Applicants are also engaging with East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils) on maintenance and aftercare measures that it could adopt in order to reduce the concerns expressed in relation to the growth rates and deliverability of mitigation in a timely manner. These are described further in the OLEMS submitted at Deadline 3 (REP3-030).</p>
30	<p>19. It is welcomed that the Applicant has provided a copy of the IEMA (2019) EIA Quality Mark Article⁴ - Predicting the growth of tree and hedge planting when determining the effectiveness of mitigation. We would note that this is a reprint of a 2013 article written for the IEMA magazine 'Transform'. As set out previously we consider that the description of this article by the Appellant as 'guidance'⁵ is misleading. We also consider that the strong caveats in the article with regard to the importance of establishing local conditions are never referred to when the document is referenced. Nor is it made clear that the growth rates quoted are only 'a rule of thumb' and that it is recommended that 'annual growth is calculated by taking clues from the existing trees and hedges in the locality.'⁶</p>	<p>The Applicants address the issue of growth rates in some detail in the Updated Photomontages Clarification Note (REP3-062) submitted at Deadline 3, particularly in Section 3.1.4.</p> <p>The Institute of Environmental Management and Assessment (IEMA) (2019) Environmental Impact Assessment (EIA) Quality Mark Article – 'Predicting the growth of tree and hedge planting when determining the effectiveness of mitigation' was written as a contribution to the EIA Quality Mark's commitment to improving EIA practice. The Applicants consider it wholly appropriate to refer to guidance contained within it. There is a relative paucity of guidance and evidence on the matter of growth rates. This EIA quality mark article from IEMA was submitted as part of the Hornsea Three Offshore Wind Farm DCO application (submitted as Appendix 40 at Deadline 4 of the Hornsea Project Three Offshore Wind Farm Examination), so there is a precedent for its</p>



ID	Written Representation	Applicants' Comments
		<p>consideration within the examination for other nationally significant infrastructure projects (NSIPs).</p> <p>The Applicants agree that it is important to take clues from the growth patterns of existing nearby vegetation and notes the extent and height of existing hedgerows and woodland in the vicinity, which demonstrate the suitability of the local area for plant growth. The Applicants consider that there is no reason to suppose that an effective and deliverable landscape planting and screening cannot be established, subject to approval of the detailed LMP design and appropriate preparation of soil, species, stock selection and quality of planting and aftercare.</p>
31	<p>20. The quotations provided in Appendix 1 to the Updated Photomontages Clarification Note (Paragraphs 7 & 8) do not include references to the paragraphs which stress the importance of establishing the local conditions. Overly optimistic tree growth rates have been challenged at previous DCO examinations. They were questioned at the DCO for the Wylva Nuclear Power Station, where local growth rates were also shown to be much lower than the average, for very different reasons to those affecting tree growth in Suffolk.</p>	<p>The Applicants note that the final paragraph in the IEMA (2019) EIA Quality Mark Article 'annual growth is calculated by taking clues from the existing trees and hedges in the locality', specifically refers to 'more exposed locations'. The substations site is not an exposed location, however the Applicants accept the importance of local conditions and as noted above, considers that these are conducive for good plant growth.</p> <p>The Applicants consider that there is potential to develop a scheme which would achieve the assumed growth rates, by ensuring careful handling and preparation of soil and the site, appropriate species and stock selection and the quality of planting and aftercare, including watering. The LVIA has assumed that these measures would be embedded in the delivery of the mitigation and that the assumed tree growth rates and height ranges can be delivered.</p>
32	<p>21. The applicant has accepted the Councils' proposals for an adaptive planting maintenance scheme which includes <i>'the option to suspend /extend the maintenance periods for discrete areas of planting and target specific measures to improve such areas, in cases where the planting</i></p>	<p>The Applicants note that its proposals to prepare a LMP based upon an adaptive management scheme (dynamic aftercare) are welcomed. As described in the OLEMS (REP3-030), the Applicants consider that such measures will de-risk the timely delivery of planting, achieve optimum</p>

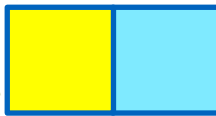


ID	Written Representation	Applicants' Comments
	<p><i>does not establish satisfactorily for any reason.</i>⁷ Whilst this is welcomed, the suspension or extension of the maintenance period will not help to achieving the overly optimistic tree heights shown at 15 years and it is regretted that the applicant did not revise these optimistic tree heights in line with the professional evidence provided at the examination in person and in writing.</p>	<p>levels of plant growth and provide greater confidence that effective screening from the tree planted areas will be achieved before the end of the adaptive management period. The Applicants address the issue of growth rates in some detail in the Updated Photomontages Clarification Note (REP3-062) submitted at Deadline 3, particularly in Section 3.1.4. With reference to this commentary, the Applicants do not consider it necessary to revise the tree/woodland heights for the mitigation scheme assumed in the LVIA.</p>
33	<p>22. It is assumed that all photomontages which will have been revised for Deadline 4 will:</p> <ul style="list-style-type: none"> • include a baseline photograph at the same size as the photomontage. • Provide more detailed information of the proposals that are being shown, such as 3D models of the substations buildings and equipment, and ground modelling ; and • omit misleading 'advance' planting. 	<p>The Applicants have provided updated photomontages from eight key LVIA viewpoints in Appendix 1 of the Landscape and Visual Impact Assessment Addendum submitted at Deadline 4 (REP4-031). The Applicants have also provided updated photomontages from a further six key Cultural Heritage viewpoints at Deadline 4 as part of the Heritage Assessment Addendum (REP4-006). These include a 53.5 degree horizontal field of view (HFoV) baseline photograph at the same size as the photomontage; are based on the 3D models of the substations buildings and equipment shown in Plate 5.2 of the Onshore Substations Update Clarification Note (REP3-057) and omit early planting growth.</p>
EN010077-003281-8.7 EA1N Outline Landscape and Ecological Management Strategy (Tracked)		
34	<p>23. The commitment to pre-commencement planting has now been withdrawn and replaced with the vaguely defined 'early' planting which 'may' be implemented. The early planting is further qualified on Figure 7 OLMP Timing of Planting, as 'Potential early planting'. In contrast, it was previously stated that these areas would be planted 'Pre-commencement'. Even previous commitments such as 'as early as possible' have been omitted.⁹</p>	<p>A change in terminology has been applied to the wording of the OLEMS to change the term 'pre-construction planting' to 'early planting'. This does change the Applicants' commitment to these opportunities for early planting, which are shown in Figure 7 OLMP Timing of Planting and described in section 3.5.5 of the OLEMS (REP3-030). This is clear that 'early planting and re-instatement of gappy hedgerows will be implemented in order to establish plants and provide for screening'.</p>



ID	Written Representation	Applicants' Comments
35	<p>24. The increase in individual extra heavy standard and light standard trees along hedgerow boundaries is welcomed. It is not clear what the reference to tree lined avenues¹⁰ relates to. The substations are located in a rural landscape in which tree lined avenues are not characteristic.¹¹</p>	<p>The Applicants note that proposals to increase individual extra heavy standard and light standard trees along hedgerow boundaries are welcomed. The Applicants note that the term 'tree-lined avenues' used occasionally in the OLEMS (REP3-030) (e.g. para 45) would more accurately be described as 'tree lined lanes', as referred to elsewhere with the OLEMS (REP3-030) such as in para 113 – 'Over time, these trees will contribute towards a network of re-instated historic green lanes, most of which have been lost to agricultural intensification over the years as described in Section 3.5.6 of the OLEMS'. The re-instatement of such tree lined green lanes is historically appropriate in the local landscape character.</p>
36	<p>25. The provision of watering for the tree planting as part of an adaptive planting maintenance scheme is welcomed. However, the expert evidence of John Rose a local nursery man is that. <i>'The expected growth rates of 30cm per year for the first five years followed by 50cm per year for the ten years following is in my opinion optimistic given the present dry summers experienced in Suffolk. I would say that these growth rates are only possible given a nursery situation of intensive irrigation and care.... This would necessitate the installation and continuous use of an extensive irrigation system together with mulching to retain moisture. This is as well as weed and herbage control to maintain weed free areas around the plants.'</i> We do not yet have the details of the adaptive planting maintenance scheme which are promised as part of the Landscape Management Plan, but from the details provided to date it seems unlikely that they will be equivalent to a nursery situation of intensive irrigation and care.</p>	<p>The Applicants note that its proposal for watering of tree planting as part of a LMP based upon an adaptive management scheme (dynamic aftercare) is welcomed. Landscape management activities will be specified in the LMP to include regular watering and mulching to retain moisture, as well as weed and herbage control to maintain weed free areas.</p> <p>As noted above, the Applicants address the issue of growth rates in some detail in the Updated Photomontages Clarification Note (REP3-062) submitted at Deadline 3, particularly in Section 3.1.4 and believes that there is potential to develop a landscape management scheme which would achieve the assumed growth rates, by ensuring careful handling and preparation of soil and the site, appropriate species and stock selection and the quality of planting and aftercare.</p>
37	<p>26. It is welcomed that the diversions to the PRoW will be in place prior to the existing PRoW being stopped up rather than by the end of the</p>	<p>The Applicants note that its proposal for diversions to the PRoW to be in place prior to the existing PRoW being stopped up is welcomed.</p>

ID	Written Representation	Applicants' Comments
	<p>construction phase as previously proposed. It is also welcome that the correct length to be stopped up (693m) has now been acknowledged,¹² nearly 40% greater than the figure originally given (498m).</p>	
38	<p>27. Paragraph 142 refers to 'A short P_{RoW} diversion, a medium P_{RoW} diversion and a longer P_{RoW} diversion .. for the permanent diversion of P_{RoW} ID number E3E-354/006/0.'¹³ However, the subsequent paragraphs (143-145) only describe two options for diversion. Dwg No EA1N-DEVDRG-IBR-001046, Sheet 7 of 12 in EN010077-003260-2.6 EA1N Permanent Stopping up of P_{RoW} Plan shows that these two diversions are in fact of similar length and neither of them could be described as a 'short' diversion.</p>	<p>Please refer to Footpath Reference 36 in Table 3.1 of the Outline Public Rights of Way Strategy (REP3-024). Relative to one another, there are short, medium and long diversion options available to P_{RoW} users.</p>
39	<p>28. The SPR substations in Figure 9 OLMP Illustrative Plan (GIS) appear to be larger than in the other plans and the planting around the Cable End Sealing Compounds is omitted. It is assumed that these are drafting errors.</p>	<p>Figure 9 OLMP Illustrative Plan (GIS) submitted in the updated OLEMS (REP3-030) at Deadline 3 was a copy of the version submitted with the Applications. It had not been updated for Deadline 3 to show the reduced substation footprints or updated planting (as was shown for the Air-Insulated Switchgear (AIS) National Grid substation in the other OLMP figures). The Applicants have prepared an updated version of Figure 9 OLMP Illustrative Plan (GIS) submitted in the Outline Landscape Mitigation Plan submitted at Deadline 4 (REP4-015).</p>
40	<p>29. Given the reduction in the footprint of the SPR substations it is unclear why there has not been a proportionate reduction in area removed from agricultural use. This is additionally the case with regard to the GIS option for the NG substation. There appears to be sufficient space to the west of the proposed substations which is not planted to accommodate a further substation.</p>	<p>As described in the OLEMS (REP3-030) (paragraph 37), the OLMP provides solutions for landscape planting proposals for development with either AIS or GIS National Grid substation designs. As can be seen from the figures within the OLEMS (REP3-030), the area to the west of the National Grid substation has been refined based on the original Applications to increase the landscaping at the western extent, which has resulted in the National Grid substation SuDS basin being relocated further to the east. As has been stated by the Applicants throughout,</p>

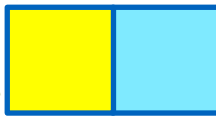


ID	Written Representation	Applicants' Comments
		<p>these are outline plans which will be refined to reflect the final design of the onshore substations and National Grid infrastructure, therefore flexibility is essential at this stage of the Projects to ensure an optimum design is developed at the detailed design stage. The landscape masterplan is also subject to the consultation processes presented within the Substations Designs Principles Statement (REP4-029).</p>
<p>EN010077-003238-ExA.HA.D3.V1 EA1N&EA2 Applicants Responses to Hearings Action Points (ISH1, CAH1, ISH2)</p>		
41	<p>30. The Applicants accept that the A12 does not exert a local influence on the character of the site and point out that it is not described as doing so in the 'subsequent local level assessment in the LVIA (Chapter 29) (APP-077)' 14. This is exactly the point that was being made at the Hearing, that judgements made during the RAG assessment were fundamentally flawed and that the choice of Friston as the location for the substations is unsound.</p>	<p>The presence of the A12 was noted in the RAG assessment for the Ancient Estate Claylands Landscape Character Type (LCT) based on the Suffolk Landscape Character Assessment (LCA) description, which notes this LCT has been subject to change more widely because of its relationship with the A12. The scenic quality of Option 7/7A (Grove Wood, Friston) has been influenced by other detractors described under Item 24 (page 28) of the Applicants Responses to Hearings Action Points (ISH1, CAH1, ISH2).</p> <p>The Applicants consider that the broad findings of the RAG assessment helped inform the site selection process. The attempts by SASES to describe the RAG assessment as the site selection are not accurate and are misleading. The RAG assessment does not in itself identify the chosen onshore substation site. It was a tool that allowed sites to be compared and progressed to further assessment stages. The Applicants consider that the RAG assessment is the start of a process of identifying issues, from which further key issues were identified and considered in more detail. Following the RAG assessment, an Area of Outstanding Natural Beauty (AONB) Appraisal (Appendix 4.3) (APP-444) and a Summary Note on Landscape and Visual Impact and Mitigation (Appendix 4.5) (APP-446) were undertaken which went beyond the 'high level' scoring of the RAG assessment to a consideration of potential</p>

ID	Written Representation	Applicants' Comments
		<p>impacts of development in zones both inside and outside of the AONB (including Zone 7 (W1)) in greater detail to inform the site selection process. Sensitivity and potential magnitude of change was considered in section 2.1 of Appendix 4.5 (APP-446). This comparative material identifies the key landscape and visual issues, summarises the impacts and the potential mitigation and was all undertaken and considered as part of the site selection process.</p>
42	<p>31. It is for the ExA to decide whether the features described on pages 28-20, apart from the high voltage transmission line, are genuine detractors from the rural character of the landscape surrounding Friston.</p>	<p>Noted.</p>

2.2 Traffic and Transport

ID	Written Representation	Applicants' Comments
Outline construction traffic management plan - SPR Document 8.9 000943 Rev 01 [APP-586]		
1 Introduction		
1	Para 3 The OCTMP states that the final CTMP will not be presented until after appointment of contractors. The statement can be interpreted as not providing a CTMP until all subcontractors and yet lower tiers of contractors are appointed. This opens the prospect of a fully definitive CTMP not being agreed until after commencement of works.	<p>The Outline Construction Traffic Management Plan, Section 1 (REP3-032) sets out the purpose of the plan is to set out the standards and procedures for managing the impact of Heavy Goods Vehicle (HGV) traffic during the construction phase of the Projects.</p> <p>Requirement 28 of the draft DCO (REP3-011) stipulates that no stage of the onshore works may commence until for that stage a construction traffic management plan and traffic management plan have been submitted to approved by the relevant authorities.</p>
2	Para. 4 It is noted that Final CTMP appears to be limited to procedures for HGV traffic during the construction phase. There is no mention of pre-construction traffic, post construction traffic, or the operational phase, nor any mention of non-HGV traffic.	<p>The Outline Travel Plan (REP3-036) sets out the management and controls for Projects' non-HGV traffic.</p> <p>The Outline Access Management Plan section 3.2 (REP3-034) sets out the management and controls for site preparation traffic.</p> <p>Section 26.6.2 of Chapter 26 Traffic and Transport (APP-074) details no significant operational traffic impacts and therefore this phase has not been included within the DCO plans.</p>
3	Para 19 Plate 1.1 indicates that the TCo (traffic coordinator) will be an intermediary between the local community, Parish Council and LAs (Highways) and SPR. This approach is considered to be a recipe for the dilution of local residents concerns.	<p>The role of the Transport Coordinator (TCo) has proven to be effective from experience on the East Anglia ONE project. The creation of a TCo role aims to achieve the opposite and will provide a framework to ensure that local communities can feed into the final Construction Traffic Management Plan post-consent.</p>



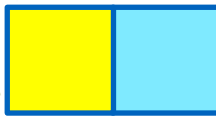
ID	Written Representation	Applicants' Comments
4	Para 22 Refers to the appointment of a Local Community Liaison Officer, but fails to indicate remit or hierarchic position.	The role of the local community liaison officer has proven to be effective from experience on the East Anglia ONE project. The Applicants do not deem remit or hierarchical position appropriate to confirm at this stage.
2 Control of HGV Movements		
5	Para 24 The OCTMP reiterates that the Applicant considers the environmental impact of traffic would not be 'significant', that is, 'not significant' in terms defined by the Applicant Local residents may well have a difference of opinion on what is / is not significant.	The Applicants refer to Chapter 5 Environmental Impact Assessment Methodology (APP-053) and Chapter 26 Traffic and Transport (APP-074). These chapters explain how the Applicants reached the conclusions presented within the Outline Construction Traffic Management Plan (REP3-032) and the significance terminology.
6	Para 31 The OCTMP Indicates that all HGV construction traffic will enter the substation and NG sites via Access 10, yet drawing in the Outline Access Management Plan (OAMP) [Reference SPR Document 8.10 IBR – 00944] shows the splay at Access 13 is sized to accept a 6-axle HGV. [See– Plate TP4842-DR022].	Access 13 has been designed to accept the largest vehicle likely to be required for servicing during operational phase.
7	Para 32 The OCTMP fails to make clear if the above restriction applies to HGVs and HGVs only. The OCTMP must clarify exactly the numbers and type of all other vehicle types entering or leaving via Access 13, including light commercial vehicles and employee vehicles.	Table 2.1 of the Outline Construction Traffic Management Plan (REP3-032) confirms no HGVs will be permitted to use Access 13. Table 2.1 of the Outline Travel Plan (REP3-036) details the total light vehicles using this access.
8	Para 34 It is noted that the OCTMP states all HGV requiring access to the NG substation site will enter (and leave?) by Access 10. What is not clear is the size and composition of the additional traffic requiring access to the NG substation via Access 13	
9	Para 35 Table 2.1 indicates likely daily peak HGV movements at Access Points 1&2 is 152 (Scenario 1), and at Access Points 9&10 is 255. Given a 12-hour working day, this is a movement rate of one every 3 minutes: given	The Outline Construction Traffic Management Plan paragraph 36 (REP3-032) clarifies: "The numbers presented in Table 2.1 represent the peak demand that could travel to each access when considered in

ID	Written Representation	Applicants' Comments
	an 8 hour delivery slot this gives an HGV every 2 minutes – not exactly lacking in “significance” as stated in Para 24. Note this is just the HGV estimate. There are likely to be numerous other movements by smaller goods vehicles, ie < 7.5 tonnes GLW.	isolation. The assessment noted that construction activities would not all peak at the same time and determined a peak daily HGV demand of 210 and 270 two-way HGV movements for scenario 2 and scenario 1 respectively. Therefore, both the daily access demand and aggregated overall demand will inform the approach of the final CTMP.”
10	Para 38 The OCTMP indicates that the final CTMP will introduce a delivery booking system but fails to define what category of vehicle will come within the remit of a ‘booking system’. The Applicant must acknowledge that deliveries by goods vehicles just below the HGV starting point of 7.5 tonnes GLW are a realistic proposition if local suppliers are involved. Where are the figures for this class of vehicle?	Please refer to Applicants' Comments on Substation Action Save East Suffolk (SASES) Deadline 1 submissions (REP4-023) for details of how non-HGV construction traffic has been derived.
11	Para 40 The OCTMP states aggregates will be off-loaded and be stockpiled, and then loaded according to need. This action has the potential to generate considerable noise in an area close to residential property (Knodishall). No consideration of the noise issue is contained in the Applicant’s analysis of construction traffic noise. The OCTMP fails to note the process of stock piling will lead to increased HGV movement whilst assembling the stockpile.	Controls for construction phase noise are contained in section 9 of the Outline Code of Construction Practice (REP3-022). Construction noise has been assessed within Chapter 25 Noise and Vibration (APP-073).
12	Para 41 Offloading / loading of aggregate at 7:00 am could be regarded as a considerable nuisance by residents living in close proximity to the Consolidation Compounds.	
13	Para 48 States use of a pilot vehicle to gain site entry at Access Points 5&6 would be “infrequent”. The OCTMP needs to provide a definition of this term as it is difficult to extract this from other data.	Infrequent is contextualised as follows: Table 2.1 of the Outline Construction Traffic Management Plan (REP3-032) confirms a maximum HGV demand for the Projects of 10 movements. A small percentage of the total demand for these accesses will be of the maximum length articulated HGV, which requires a pilot

ID	Written Representation	Applicants' Comments
		vehicle assistance. All other HGVs (e.g. tippers, smaller 'artics') do not require pilot vehicle assistance). Where possible, loads will be decanted to smaller HGVs to avoid the requirement for a pilot vehicle
14	<p>Para 53 Table 2.2 The OCTMP needs to include a list of those events it considers impacted by site traffic. Most local events are planned and known to the police years in advance. There is no indication that the Applicant has gathered data from Local Authorities or Police regarding impact of events on site traffic.</p> <p>The OCTMP fails to address the production of contingency plans to cope with an RTA on the stretch of A12 between Marlesford and Friday street to ensure local roads are not used by site traffic as relief roads. Given the likely impact on local villages as HGV and other drivers seek to meet pre-set schedules, this is considered a serious omission.</p>	<p>Table 2.2 of the Outline Construction Traffic Management Plan (REP3-032) sets out the measures for managing the construction traffic during planned and unplanned events and major incidents. It is the CTMP co-ordinator's responsibility to liaise with stakeholders and suppliers to implement contingency plans.</p>
15	<p>Para 57 Annex 2 Indicates that "Non-Special AIL" movements will average about 16 per month over the 36 month construction period (Scenario 1), occasionally requiring 2 or more movements per day. The Applicant should acknowledge that this has the capacity to cause delay and diversion on local public roads</p> <p>Note: Annex 2 Indicates a total of 39 heavy plant vehicles being on site in Sections 1,2 & 4 plus National Grid works in month 1. There is no indication of how this would be accomplished as it would seem that an operational haul road were necessary to distribute these items. Without a haul road plant would need to access the NG site via crossing point 11/12 (Grove Road) requiring plant movement through Friston, which would lead to chaos in a small village.</p>	<p>Non special order abnormal loads are set out in Traffic and Transport Clarification Note submitted to the Examination at Deadline 1 (REP1-048) and confirms a peak of three abnormal load movements per day (for two months) and average of less than one movement for the remaining Projects' duration.</p> <p>The majority of these loads would be transported by a 'standard' HGVs (similar to static caravans).</p> <p>Prior to the movement of abnormal loads, the contractor would be required to submit notifications to the relevant authorities (police, highway authorities and bridge / structure owners) through ESDAL (Electronic Service Delivery for Abnormal Loads). The ESDAL process would ensure the timing of AIL movements would be co-ordinated and potential impacts would not be significant.</p>

ID	Written Representation	Applicants' Comments
	<p>The OCTMP contains no statement regarding the effect of later non-special order AIL movements' with respect to local traffic disruption, delays, congestion.</p> <p>The OCTMP needs to clarify that Non-special AILs are excluded from the HGV category</p>	
16	<p>Para 59 The OCTMP addresses HGV emissions but no comparable assurances are provided regarding on-site emissions by heavy plant.</p>	<p>There are measures within the Outline Code of Construction Practice (REP3-022) which relate to the control of emissions from Non-Road Mobile Machinery (NRMM) – these are the control measures which are recommended in Defra technical guidance¹. This document states that if these measures are applied then construction phase plant are unlikely to have a significant impact on local air quality.</p>
<p>3 Offsite Highway Works</p>		
17	<p>Para 61 Annex 3 of the OCTMP depicts several off-highway 'mitigation' works. There are however other off-highway works at 4 other sites: Marlesford, A12/A1094 junction (Friday Street), A1094/B1121/B1069 junction, and B1121 at site Access 13. Each of these has the potential to cause driver delay or diversion but the OCTMP fails to indicate the likely magnitude or duration.</p> <p>Refers to works to be undertaken at the A12-A1094 junction (Friday Street) but gives no indication of planned duration or likely effect on congestion at the junction</p>	<p>All roadworks proposals will be subject to approval by Suffolk County Council exercising powers under the Traffic Management Act 2004 and the New Road and Street Works Act 1991 to secure the safe and expeditious movement of traffic.</p>
18	<p>Para 65 Refers to works to be undertaken in the vicinity of the A1094 and B1069 junction at Snape: again there is no indication of duration or likely effect on the Snape crossroad junction. The junction is frequently</p>	

¹ <https://laqm.defra.gov.uk/documents/LAQM-TG16-February-18-v1.pdf>



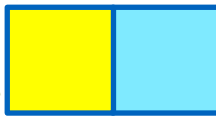
ID	Written Representation	Applicants' Comments
	congested in the peak holiday season and when events are being held at Snape Malting. Roadworks in the area have the potential to adversely affect safety by obstructing vision of on-coming traffic.	
19	Paras 72, 73 & 74 Church Road Friston. The document fails to acknowledge that the proposed works will take place in immediate proximity to residential properties, the Village Hall and Parish Church, for which there is no alternative vehicular access. The OCTMP should have indicated that satisfactory work round plans will be established. Consultation by the CTMPCo is an inadequate response.	
4 Monitoring and Action Plan		
20	Para 78 et seq State that HGVs associated with construction will carry an identifier marking and be subject to monitoring and control. SPR should institute a similar arrangement for ALL vehicles associated with the Project, some of which may be up to 7.5 tonnes GLW, and not readily separable when viewed by the average observer, from an HGV weighing 10 tonnes.	<p>The unique identifier is proposed to enable interested parties to identify a HGV that is not adhering to the route controls.</p> <p>Applicants' Comments on Substation Action Save East Suffolk (SASES) Deadline 1 submissions (REP4-023) sets the Applicants' position of not prohibiting routes for Light Commercial Vehicles, therefore negating the need for identifiers for non-HGV vehicles.</p>
21	<p>Synopsis</p> <p>1. The Outline Construction Traffic Management (OCTMP) presents information on the management of HGV traffic but fails to indicate how all other vehicular traffic will be managed. No data is presented to show that the effect of all non-HGV traffic may be safely ignored.</p> <p>2. The OCTMP indicates there may be stockpiling of aggregates at Construction Consolidation Compounds, but there is no indication that aspects such as noise and short term increases in HGV movement have been considered.</p>	<p>The Outline Travel Plan (REP3-036) sets out the management and controls for non-HGV traffic associated with the Projects.</p>

ID	Written Representation	Applicants' Comments
	<p>3. In the OCTMP the Applicant enters the opinion that the impact of 400 peak two-way movements of HGVs in the development area is 'not significant'. To village residents, the passage of an HGV every 2-3 minutes is far from insignificant, especially if swelled by non HGV site traffic.</p> <p>4. No data is provided to show the impact on traffic congestion of non-special AIL movements, nor of roadside works.</p>	
Outline travel plan - SPR Document 8.11 IBR – 000945 Revision 01 [APP- 588]		
1 Introduction		
22	<p>Para 4 States final detailed Travel Plan (TP) will be produced post consent, prior to commencement of onshore construction. Elsewhere the Applicant has indicated a period of pre-construction work. Where is the TP relating to this activity?</p>	<p>The Outline Access Management Plan section 3.2 (REP3-034) sets out the management and controls for site preparation traffic.</p>
23	<p>Para 5 States that the OTP covers employee movement and not HGV movement. What control will be exerted by the Applicant regarding vehicle movement that is neither employee or HGV ? Excluding AILs, there must be other vehicle movements, such as LCV and LDV in the category >7.5 tonnes which have been excluded (or forgotten?)</p>	<p>The Outline Travel Plan (REP3-036) sets out the management and controls for Projects' non-HGV traffic.</p> <p>Please refer to Applicants' Comments on Substation Action Save East Suffolk (SASES) Deadline 1 submissions (REP4-023) for details of how non-HGV construction traffic has been derived.</p>
24	<p>Paras 16-19 The OTP envisages the existence of multiple contractors each appoint its own TPCo: this opens the door to multiple interpretations of travel policy, with Applicant acting as a "go between" Highways Stakeholders and Local Community and the plethora of contractors and sub-contractors. Plate 1.1 should make it clear that the Applicant is ultimately responsible for the activity of all contractors and sub-contractors in respect of vehicle movement.</p>	<p>The role of the TCo has proven to be effective from experience on the East Anglia ONE project.</p> <p>Plate 1.1 shows the relationships and clearly shows the TCo coordinating the TPCos. Paragraph 19 outlines the TCo responsibilities as:</p> <ul style="list-style-type: none"> Assisting and directing the TPCos in managing the implementation of the final Travel Plan;

ID	Written Representation	Applicants' Comments
		<ul style="list-style-type: none"> • Reporting the monitoring of the final Travel Plan to SCC; • Acting as a point of contact for the local community; and • Providing a link between the TPCOs and the Applicant.
2 Control of Personnel Movements		
25	Para 24 The OTP concludes that when proposed mitigation measures are embedded, the Environmental Impact of employee vehicle movement would not be “significant” in EIA terms. It should be noted these EIA terms appear to be constructs developed by the Applicant and not defined independently.	The Applicants refer to Chapter 5 Environmental Impact Assessment Methodology (APP-053) and Chapter 26 Traffic and Transport (APP-074). These chapters explain how the Applicants reached the conclusions presented within the Outline Construction Traffic Management Plan (REP3-032) and the significance terminology.
26	Para 25 The Applicant has not presented any evidence from other developments to support the assertion that average employee vehicle occupancy is ≥ 1.5 .	
27	Para 28 It is noted that the OTP does not prescribe routes by which site employees should travel. This means that local residents will be faced with increased traffic on minor roads and by-ways at peak time of usage (school runs etc).	Chapter 26 Traffic and Transport (APP-074) and Appendix 26.2 (APP-528) assess the effects of the Projects' construction traffic on sensitive receptors and mitigates any residual impacts.
28	Para 30 The OTP states: “...The Applicant has mitigated the risk of not meeting the employee car share ratio of 1.5 through commitments and measures contained within the OTP.....” The Applicant should explain or enumerate these measures.	Paragraph 28 of the Outline Travel Plan (REP3-036) states “The employee to vehicle ratio is secured through the commitments and measures set out within Section 2.3 ”.
29	Para 31 The OTP acknowledges the potentially significant impact of site traffic at the A12/A1094 road junction (Friday Street) and A1094/B1069 (Blackheath Corner) and proposes measures to alleviate these impacts.	The Applicants disagree and would welcome further comments in this respect in order to provide additional clarity.

ID	Written Representation	Applicants' Comments
	The ensuing paragraphs 32 to 43 do not provide a convincing explanation of how the impact of site traffic at these junction will be reduced.	
3 Monitoring, Enforcement and Action Plan		
30	Para 45 The OTP indicates employee arrival and departure will be monitored, but fails to explain how this will “enforce” a car share ratio of 1.5.	Section 3 of the Outline Travel Plan (REP3-036) details Monitoring and Enforcement measures.
31	Paras 45 to 49 The OTP describes a typical bureaucratic reporting plan but fails completely to show the need how this will provided expedient remedy for emerging congestion and traffic delay concerns.	The Applicants note SASES concerns and would like to highlight that at this stage the plan is at ‘Outline’ stage and seeks to establish the framework and mechanisms for the management of access traffic. Additional information will be provided in the final Travel Plan prepared post-consent.
32	Paras 50 The OTP seems here to have strayed into developing processes for handling ‘construction’ traffic rather than employee access traffic	
33	Paras 50 to 53 The OTP puts forward a further bureaucratic plan to “enforce” the final TP, but suggested process seems most unlikely to resolve promptly a “here and now” issues concerning employee access behaviour.	
34	Para 55 The OTP indicates that the Contractors will be left to develop their own measures to implement the provisions of the TP. There is no indication of how the Applicant, having overall responsibility for the process, will monitor, agree, accept changes etc to these measures.	Section 1.2 of the Outline Travel Plan (REP3-036) sets out a governance structure that is designed to act on day to day traffic challenges.
Synopsis		
35	This document does not address the relatively straightforward concerns by local residents that employee access to the development site needs to be managed without detriment to local traffic flow.	The Applicants do not share this view but note SASES’ position on this document.

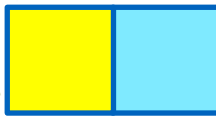
ID	Written Representation	Applicants' Comments
Outline access management plan SPR Document 8.10 IBR – 000944 Revision 01 [APP-587]		
Introduction		
36	<p>Para 3 Indicates the Applicant (SPR) intend to provide the definitive position on Site Access, post DCO consent and after contractors have been appointed. The Applicant further wishes to define the term 'contractor' after DCO consent. Given that site access is required from Day 1, DCO consent should be conditional on provision of the Access Management Plan, with a formal control process for any change sought post consent.</p>	<p>The requirement to produce an Access Management Plan is captured within Requirement 16 of the draft DCO (an updated version has been submitted at Deadline 5, document reference 3.1).</p>
Access Design		
37	<p>Para 13 Divides the onshore works into 7 areas, each requiring access from the public highway. Annex 2 of the Outline Construction Traffic Management Plan (OCTMP) [SPR Document 8.9 000943 Rev 02] details the movement of heavy plant (as non-special AILs), but fails to indicate their need for Access. Plate Figure 1 EA2- DEV-DRG-IBR 000741 dated 14/12/20, implies the existence of 6 other access points, approximate map references as below:</p> <p>Grove Road Friston TM 41512 60512</p> <p>Aldeburgh Road Aldringham (East of Hundred River) TM 44640 60816</p> <p>Aldeburgh Road Aldringham (West of Hundred River) TM 44640 60720</p> <p>Sizewell TM 45848 62480</p> <p>Thorpeness TM 46480 60272</p> <p>Thorpeness TM 47000 60000</p>	<p>Please refer to ID51 of the Applicants' Comments on SASES' Deadline 1 Submissions (REP4-023) submitted at Deadline 4.</p>



ID	Written Representation	Applicants' Comments
	<p>The OAMP must indicate the purpose of these access points, stating clearly physical extent, frequency of use, duration of use and limitations to be imposed regarding plant type.</p> <p>Regarding the above, note should be taken of a statement made in Chapter 6 of the Project Description, [vide 6.7.3.63] of reference to "Temporary Construction Access Roads".</p>	
38	<p>Para 15 Introduces the "temporary haul road" then in the following sentence uses the term "haul road", then reverts again to "temporary haul road". This inconsistent use of terminology by the Applicant, which occurs throughout the DCO submission, has caused much confusion to local residents trying to understand statements made regarding traffic, particularly those associated with HGVs. The Applicant should publish a statement to the effect that the term: 'temporary haul road' should be read as 'haul road' or vice -versa.</p> <p>Para 15 contains the statement:</p> <p>.....All construction traffic to the onshore substation and National Grid Substation to avoid travelling via Friston or Sternfield by accessing from the B1069 south of Knodishall / Coldfair Green and travelling along the temporary haul road and crossing over Grove Road;but</p> <p>Para 16 contains the statement that:</p> <p>....No HGV traffic would be permitted to travel via the B 1121 through Friston, Sternfield or Benhall Green.....</p>	<p>Noted. The Applicants note this inconsistency in terminology and confirm that where reference is made to either the 'temporary haul road' or the 'haul road', these refer to the same haul road.</p>
39	<p>Para 18 Table 2.1 The OAMP again assures the reader that ".....Access 13 would provide a permanent access to the East Anglia ONE North and National Grid substations following completion of construction...." During</p>	<p>In addition to providing access for ALLs, Section 26.6.1.6 of Chapter 26 Traffic and Transport (APP-074) outlines that during the construction phase, once this access is available, it would be used by National Grid employees.</p>

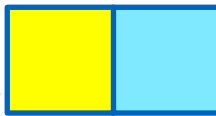
ID	Written Representation	Applicants' Comments
	<p>construction the access would only be used for Abnormal Indivisible Load (AIL) deliveries.</p> <p>These three statements are inconsistent. The OAMP must define explicitly:</p> <ul style="list-style-type: none"> • the exact purpose of Access 13 and limitations set during the construction of EA1N, EA2 and NG substations • the extent of use of Access 13 post construction 	<p>Upon completion of construction, section 26.6.2 of Chapter 26 Traffic and Transport (APP-074) details that access to the onshore substation would be via Access 13 and that vehicle movements would be limited to occasional repair, maintenance and inspection visits.</p>
40	<p>Para 21 The OAMP now defines Access 13 as the intended permanent access to all three substations. No indication is provided regarding vehicle type, load type (special or non-special deliveries), access frequency or time of day or approach direction (Sternfield or Friston). The Applicant must as a matter of urgency provide ExA and local residents with relevant details.</p>	<p>Section 26.6.2 of Chapter 26 Traffic and Transport (APP-074) details that access to the onshore substation would be via Access 13 and that vehicle movements would be limited to occasional repair, maintenance and inspection visits. On this basis Section 26.6.2 of Chapter 26 Traffic and Transport identifies no significant traffic impacts during the operational phase, therefore this phase has not been included within the DCO plans.</p>
41	<p>Para 30 This OAMP fails to define whether or not the crossing at Access 11 & 12 will be manned: visibility for southbound traffic is limited because of adjacent woodland and mud/sand from site traffic will give rise to a significant skid risk. Local knowledge associated with movement of farm vehicles knows this section of road to present a significant collision risk. No evidence is presented to show that signage or reduced speed limit will prevent collisions at this crossing.</p>	<p>Access 11 and 12 will provide a crossing of Grove Road only. Paragraph 30 of the Outline Access Management Plan (OAMP) (REP3-034) outlines that construction vehicles would give-way to traffic on the public highway and cross in gaps in traffic when safe to do so. To ensure that drivers are able to see oncoming traffic and therefore safely cross Grove Road, the crossing has been designed to ensure visibility splays in accordance with the measured speeds can be provided in both directions. To achieve the required visibility splays there would be a requirement for localised vegetation clearance this is detailed within Drawing TP-PB4842-DR014 Rev D0.3 provided within Annex 2 of the OAMP (REP3-034).</p>
Traffic Management		

ID	Written Representation	Applicants' Comments
42	<p>Annex 1 – Plate TP PB4824 DR 022 shows clearly that the splay at Access13 has been sized on the basis of the largest category HGV, (six - axle, 44 tonnes GLW). This again contradicts statements made in paras 15 and 16 above.</p> <p>The diagram clearly shows an HGV heading in the direction of Sternfield suggesting that the Applicant has always envisaged HGVs entering/leaving the site from the B 1121 via Sternfield</p>	<p>Access 13 has been designed to accommodate a range of vehicle types that could be required for the occasional repair, maintenance and inspection visits at the substation.</p>
Synopsis		
43	<p>1. The Applicant needs to produce a clear, unambiguous statement of the purpose and use of Access 13 for the duration of:</p> <p>The Pre-construction Phase</p> <p>The Construction Phase (National Grid Substation)</p> <p>Construction Phase (EA1N and EA2)</p> <p>Operational Phase</p> <p>2. The Applicant needs to disclose the purpose and use of any pre-construction access points, such as may be inferred from Drawing EA2-DEV-DRG-IBR-000741 at the following map references:</p> <ul style="list-style-type: none"> o Grove Road Friston TM 41512 60512 o Aldeburgh Road Aldringham (East of Hundred River) TM 44640 60816 o Aldeburgh Road Aldringham (West of Hundred River) TM 44640 60720 o Sizewell TM 45848 62480 o Thorpeness TM 46480 60272 	<p>Please see responses provided above.</p>

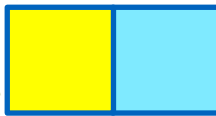


ID	Written Representation	Applicants' Comments
	<p>o Thorpeness TM 47000 60000</p> <p>3. The OAMP should clarify whether haul road crossings where there is no access (ie crossings 3/4, 7/8 and 11/12) will be permanently manned to reduce risk of collision with local road users.</p> <p>4. The Applicant should review all published text with respect to traffic management to ensure there is no ambiguity in terminology, eg “haul road” or “temporary haul road”.</p> <p>5. It appears that the Applicant intends to delay proper definition of site access to post DCO and appointment of contractors. This is viewed as unacceptable as this would allow a ‘contractor’ or even a ‘sub-contractor’ to re-define use of an access, possibly detrimental to local residents.</p> <p>6. The OAMP contains diagrams showing roadside alterations at crossing points for the haul road, and these are referred to as access points. The Applicant needs to make it clear in this documents and in the OCTMP that crossing points 11/12, 8/7 and 4/3 will not be used as access points from the public road system, and that this restriction applies to all categories of vehicle including employee private transport.</p>	
<p>Traffic and Transport Deadline 3 Clarification Note [REP 3-055]</p>		
44	<p>Paragraph 4 States note contains details of all road closures. This is inaccurate See response at para 14</p>	<p>Section 2.5 of the Deadline 3 Traffic and Transport Clarification Note (REP3-055) provides clarification on the Church Road closure.</p>
45	<p>Paragraph 5 Refers to Chapter 26 Traffic & Transport [APP-074] – Drainage Connections on Church Road Friston</p>	<p>Noted.</p>
46	<p>Paragraph 6 Note 3m lane width and 0.5m lateral safety clearance</p>	

ID	Written Representation	Applicants' Comments
47	Paragraph 7&8 Note 3 metre road width – will cause delays as buses and delivery vehicles will need to slow to walking pace to navigate	
48	Paragraph 11 States a working area of 2.5m would be needed - Surely 2.5 m width	
49	Paragraph 12 Assumption by Applicant that minimum road width of 5.0 m is OK Explain “accommodation works”	Accommodation works are defined as a temporary section of road widening within the Order limits in paragraph 15, 16 and 20 of Deadline 3 Traffic and Transport Clarification Note (REP3-055).
50	Paragraph 13 States B1121 as having a width of 5.8 metres. Measurements made of road width using laser range finder (quoted accuracy 0.01 metre) indicated road width in vicinity of projected Access 13 to be 5.1 metres (tarmac width)	All roadworks proposals will be subject to approval by SCC exercising powers under the Traffic Management Act 2004 and the New Road and Street Works Act 1991 to secure the safe and expeditious movement of traffic.
51	Paragraph 14 Omits to mention Church Road (para 5 above) is single carriage way with no passing places other than to use residents driveways over its complete length. Road widening is not an option.	Please see ID1 of this table.
52	Paragraph 16 Mentions Grove Road temporary widening: does not mention reinstatement	Noted.
53	Paragraph 17 APP-074 not AP-074?	
54	Paragraph 18 The proposed works will inevitably interrupt traffic flow (some of it large farm vehicles). Any diversion for those for residents living to the north of Friston and wishing to visit church, Village Hall, pub, bowls club or get to the petrol station at Snape will involve an additional journey of several miles.	All roadworks proposals will be subject to approval by SCC exercising powers under the Traffic Management Act 2004 and the New Road and Street Works Act 1991 to secure the safe and expeditious movement of traffic.



ID	Written Representation	Applicants' Comments
55	Paragraph 19 Explain fully the term “alternative accommodation works”	Accommodation works are defined as a temporary section of road widening within the order limits in paragraph 15, 16 and 20 of the Deadline 3 Traffic and Transport Clarification Note (REP3-055).
56	Paragraph 20 Shows only works from one side of road. To complete a crossing in two stages, surely a second widening of the road on the opposite side is required. If so why does Plate 2 not indicate widening of both sides of road?	Plate 2 of the Deadline 3 Traffic and Transport Clarification Note (REP3-055) shows an indicative concept for widening a road. In order to accommodate single lane working, the widening could be provided on one side of the road or both on a site specific basis. Additional land within the order limits will be utilised to accommodate the road widening and / or works area.
57	Paragraph 21 States the approach will permit roads to remain open whilst cables are installed: no account seems to have been taken of the need to have working plant in close proximity to passing traffic.	Plate 2 of the Deadline 3 Traffic and Transport Clarification Note (REP3-055) details a roadworks concept with an accommodation works including a 2.5m works area and a lateral safety clearance of 0.5m.
58	Paragraph 24 The Applicant has based the assessment of movement of traffic past projected roadworks on a maximum HGV width of 2.5 metres. Does this include wing mirrors? If the footpath works involve kerbing, then the parked HGV(s) will require more than 2.5 metres of the available road width.	Detailed roadworks designs will be subject to approval by SCC exercising powers under the Traffic Management Act 2004 and the New Road and Street Works Act 1991 to secure the safe and expeditious movement of traffic.
59	Paragraph 26 The Applicant fails to mention that at the junction of the A1094 and B1069 visibility of the approach is severely limited. The parking of HGVs on either the A1094 or B1069 presents an existential threat to the safety of local road users.	
60	Paragraph 27 It is noted that the need for additional safety measures at the A12/B1094 junction (Friday Street) to lessen the impact of the Applicants HGV (and other) movement is, ongoing with SCC.	The Applicants have since agreed a traffic light signal solution at Friday Street with SCC as the Highways Authority. The Applicants will submit an updated Outline Construction Traffic Management Plan at Deadline 6 to reflect this.



ID	Written Representation	Applicants' Comments
61	Paragraph 30 It is noted that this 'Clarification' states "...the Works Plans (Onshore)....identify the potential requirement to undertake works along Church Road Friston" Are works required or not ? The Applicant should not equivocate.	Works will be required at Church Road to facilitate the connection of the surface water drainage system to the Friston Watercourse. Any traffic controls will be reflected within the final Construction Traffic Management Plan. It is necessary and appropriate to retain two options for the surface water drainage system routing to the Friston Watercourse as outlined in the Application for the Inclusion of Additional Land (REP1-037).
62	Paragraph 31 It is clear that to accomodate such works will require road closure, preventing access to residents, Village Hall and Church. Statements like "temporary closure" and "short period of time" are inadequate.	All roadworks proposals will be subject to approval by SCC exercising powers under the Traffic Management Act 2004 and the New Road and Street Works Act 1991 to secure the safe and expeditious movement of traffic.
63	Paragraph 33&34 The Applicant again uses the term "temporary", here in relation to changes to the currently prevailing speed limit. Where such changes are applicable to the duration of the Project , then the word "temporary" should be replaced by " for the duration of the Project"	The Applicants propose that any reduction to the posted speed limit would be in place for no longer than the duration of onshore preparation works and the construction of the Projects.
64	Paragraph 36&38&40 Given that the A12/A1094 and also A1094/B1069 junctions currently accomodate the passage of HGVs, why is it felt necessary to carry out this work? Is this an acknowledgement by SPR that without such work the projected increase in traffic is prejudicial to the safety of other road users for the duation of the Project, or is just to accommodate passage of HVAC transformers using AIL delivery? Note: later §40 which acknowledges that the increase in construction traffic is potentially prejudicial to road safety	The rationale for mitigation measures is set out in Chapter 26 Traffic and Transport (APP-074) and is summarised within Table 26.26 and Table 26.33 .
65	Paragraph 39 The Applicant should make clear that changes to the speed limit on A1094 and B1069 are for the duration of the roadworks only. If other periods of change to speed limits are envisaged then this should be clearly stated.	The Applicants confirm that temporary speed reductions associated with Work No. 35 will only be implemented for the necessary amount of time to complete the required roadworks at this location.

ID	Written Representation	Applicants' Comments
66	Paragraph 41 Can the Applicant supply calculations to support the assertion that reducing the posted A12 speed limit from 50 mph to 40 mph in the vicinity will result in a reduction impact (poor choice of descriptor!) significance from major adverse to minor adverse.	Please refer to the Deadline 4 Traffic and Transport Clarification Note (REP4-027).
67	Paragraph 42 Whilst it is accepted that a temporary reduction in the posted speed limits on the A12 and A1094, (here taken to apply solely to the duration of road alterations and assumed to be limited physically to the environs of the proposed road alterations), it is unclear how this would minimise delays to road users as stated.	Roadworks will be designed to minimise disruption to road users. All roadworks proposals will be subject to approval by SCC exercising powers under the Traffic Management Act 2004 and the New Road and Street Works Act 1991 to secure the safe and expeditious movement of traffic.
68	Paragraph 45 It is assumed that police and SCC would determine appropriate speed limits and not SPR or any of its sub-contractors	
69	Paragraph 46 It is noted that “..No construction access or egress would be permitted from crossing points”...The use of the verb form “would” contains overtones of conditionality. The Applicant should make this statement abundantly clear and show intention to abide by the restriction. See also comment s applicable to Sketches on pages 10,11 & 12, and Appendix 2	All works are conditional to DCO approval.
70	Paragraph 48 The paragraph uses the term “temporally” , which does not have the same meaning as “temporarily”. The Applicant should make clear when using the term “temporary” to mean for the duration of the programme.	The Applicants note that reference to ‘temporally’ is a typographical error and should instead read ‘temporary’. The Applicants will provide clarification on the information with Table 3.1 of the Deadline 3 Traffic and Transport Clarification Note (REP3-055) at Deadline 6.
71	Table 3.1, Pages 10,11,12. The text relating to crossing 3/4 uses the term crossing 3/4. And the sketch shows Crossing 3/4 as Access 3 and Access 4. The Table should be amended to make clear to all readers that this is a “crossing” and not an “access”. This comment applies to crossing points 7/8	The Applicants note that there is no Table 3.3 or page 52 within the Deadline 3 Traffic and Transport Clarification Note (REP3-055).



ID	Written Representation	Applicants' Comments
	& 11/12. Also, the sketch should make clear that speed limit reductions are for the duration of the programme if that is the case.	
72	Table 3.3, Page 52. Again refers crossings 11/12, 8/7 and 4/3 as "Accesses" The Applicant should make clear these are not "Accesses" but crossings.	
73	<p>Appendix 1. The Highway works, Drawing EA1N-EA2 –DEV-DRG-IBR-001254 fails to explain the purpose of the intersections of the development area with the local road network at the following approximate map references</p> <ul style="list-style-type: none"> • Grove Road Friston TM 41512 60512 • Aldeburgh Road Aldringham (East of Hundred River) TM 44640 60816 • Aldeburgh Road Aldringham (West of Hundred River) TM 44640 60720 • Sizewell TM 45848 62480 • Thorpeness TM 46480 60272 • Thorpeness TM 47000 60000 <p>These have previously been referred to as "pre-construction roads", although their purpose has never been disclosed.</p>	Please refer to Applicants' Comments on Substation Action Save East Suffolk (SASES) Deadline 1 submissions (REP4-023) for the scope of the onshore preparation works.
74	Appendix 2. Crossing 4/3. Drawing TP-PB4842-DR027 should make clear that this is not an "Access" but a crossing	The Applicants will provide clarification on the information with Appendix 2 of the Deadline 3 Traffic and Transport Clarification Note (REP3-055) at Deadline 6.
75	Appendix 2. Crossing 8/7. Drawing TP-PB4842-DR007 should make clear that this is not an "Access" but a crossing	

ID	Written Representation	Applicants' Comments
76	Appendix 2. 11/12. Drawing TP-PB4842-DR014 should make clear that this is not an "Access" but a crossing	
77	Access 13. Why does drawing TP-PB4842-DR022 show swept path for a 6-wheeled HGV, no HGV are permitted access from the B1121 via either Sternfield or Friston and the drawing text box state: ..ACCESS 13 B1121 SAXMUNDHAM ROAD MAX ARTICULATED HGV SWEPT PATH ANALYSIS.. Access 13 is described elsewhere IN SPR documentation as the intended access point to the substation complex for the AIL delivering the HVAC supergrid transformers. Why then does the drawing not show the impact of the swept areas for a multi-axle low-loader delivery	Access 13 has been designed to accept the largest vehicle likely to be required for servicing during operational phase.

2.3 Onshore Ecology

ID	Written Representation	Applicants' Comments
Important Hedgerows and Tree Preservation Order Plan REP3-010		
1	<p>23. Sheet 7 of this Plan shows the substation site with 20 lengths of important hedgerows to be removed, representing all of the hedgerows north of, and close to, the village of Friston. This will destroy the historic character of the area completely. The Applicant should explain why it is necessary to remove all of these hedges. In particular why specifically do Hedgerows 38, 39, 40, 41, 42 and 45 require removal? It would appear the Applicant wants to completely clear the site for its own convenience rather than of a necessity. There is also a conflict between this plan and Annex 1 of the OLEMS where these hedges are listed as Landscape Mitigation without removal.</p>	<p>It has been recognised by the Applicants throughout that there is a network of mature hedgerow field boundaries and hedgerow trees in the surrounding agricultural fields, however many historic field boundaries have been lost over time with agricultural intensification. The OLEMS (REP3-030) has also embedded the management and improvement of these hedgerows within the landscaping strategy. It is necessary however for discrete sections of hedgerows to be removed in order for instance to plant a hedgerow tree, or to strengthen an existing hedgerow. As the location of this planting is not yet established, the draft DCO (an updated version has been submitted at Deadline 5, document reference 3.1) includes rights across the full hedgerow to provide the necessary flexibility in optimising the final LMP.</p> <p>There is also a need to route the substations surface water drainage pipes under a small number of existing hedgerows. The precise routing of this is not yet established.</p> <p>The final LMP will contain the detailed landscaping scheme to be implemented, an important aspect of which will be to retain and improve existing hedgerows as far as practicable.</p>
2	<p>24. The new Outline Landscape and Ecological Management Plan shows new hedgerow planting to the edges of the new access road, cable sealing ends and NG substation. It should not be argued by the Applicant that this type of formal boundary hedging around modern man-made structures mitigates for the loss of historically important field boundaries.</p>	<p>The Applicants do not consider that landscape planting provides mitigation for potential cultural heritage impacts assessed. As stated within Appendix 24.7 of the ES (APP-519), '<i>The use of woodland to screen the substations has the potential to cause adverse changes in the settings of the affected heritage assets</i>'. Rather, the landscaping presented within the Outline Landscape Mitigation Plan (REP4-015)</p>

ID	Written Representation	Applicants' Comments
		<p>had regard for historic landscape character, aiming to retain the sense of openness to the landscape and avoid enclosing the village of Friston where possible.</p> <p>It should be noted that the Applicants consider that the proposed hedgerow planting mitigates potential ecological impacts associated with hedgerow removal.</p>
3	<p>25. The planting of hedging around the NG substation and along the access road will not compensate for the loss of the important hedgerows used as foraging routes and nesting sites. To the contrary the noise of the substations and the presence of vehicles will be a deterrent to wildlife.</p>	<p>The Applicants consider that that the proposed hedgerow planting at the onshore substation location as presented within the Outline Landscape Mitigation Plan submitted at Deadline 4 (REP4-015) provides a level of mitigation beyond that required to mitigate the potential ecological impacts associated with hedgerow removal. Whilst it is noted that there are lengths of hedgerow planting proposed around the permanent onshore infrastructure, there are also lengths of proposed hedgerow planting further afield within the Order limits which will provide a network of foraging and commuting routes for bats and nesting opportunities for birds.</p> <p>The Applicants have provided an assessment of operational noise impacts upon ecological receptors within the Deadline 4 Onshore Ecology Clarification Note (REP4-005) submitted at Deadline 4. The assessment concludes that the continuous noise generated by the onshore substations is the type of noise least likely to give rise to disturbance effects.</p> <p>Throughout operation of the onshore substations, the frequency of visits undertaken to site by personnel is anticipated to be very low. As such, vehicle movements during the operation phase will be minimal and are considered unlikely to result in significant adverse impacts upon mobile ecological species such as bats, birds and badgers.</p>

ID	Written Representation	Applicants' Comments
4	<p>26. As far as the key is concerned, there is no differentiation shown between <i>Potential Early Hedgerow Planting</i> and <i>Proposed Post-Construction Hedgerow</i>, both of which are shown by a green line. It can only be assumed that this hedgerow planting will occur postconstruction and therefore the impacts on wildlife, in particular bats and birds, will be extended.</p>	<p>Whilst it is accepted that the difference in the shade of colours could be clearer, the Applicants note that there is a difference in the shades of green symbolising <i>Potential Early Hedgerow Planting</i> and <i>Proposed Post-Construction Hedgerow</i> on the Outline Landscape Mitigation Plan (OLMP). This is perhaps more clearly presented in Figure 7 (OLMP Timing of Planting) of the Outline Landscape Mitigation Plan submitted at Deadline 4 (REP4-015).</p>

2.4 Public Rights of Way

ID	Written Representation	Applicants' Comments
Outline Public Rights of Way Strategy (together with Temporary Stopping up of Public Rights of Way Plan 2.6.1 and Permanent Stopping up of PRoWs 2.6.2) REP3-025, REP3-008 and REP3-009		
1	42. Paragraph 3 adds a specification for alternative permanent PRoWs, which is included at Annex A. This shows a constructed finish consisting of layers of geotextile material, aggregate, compacted Type 1 granite, finished by a wearing course of granite fines, with a total thickness of 215mm. Existing PRoWs in and around the substation site are wide trackways, up to 2M wide, with a grassed surface appropriate for a rural area and the introduction of a formally constructed pavement of unspecified width is totally unsuitable and adds to the urbanisation and industrialisation of the area. It is understood that the Local Authority would prefer the finish to be grassed, as would most walkers, including those with dogs.	The Outline Public Rights of Way Strategy (REP3-024) makes clear that the specification of any PRoW permanent diversions, will be set out in the final PRoW Strategy which requires to be approved by the relevant highway authority prior to undertaking the relevant stage of the works. Appendix A presents an example of the relevant highway authority's permanent PRoW specification to illustrate the detail to be provided within the final PRoW Strategy. The specification is therefore not the proposed specification of a PRoW permanent diversion, rather an example of the level of detail to be provided within the final PRoW Strategy.
2	43. Whilst Sheet 7 of the Temporary Stopping up of Public Rights of Way Plan shows more than 12 temporary diversions in and around the substation site, the text of Table 2.1 in the OPRoWS on page 10 in relation to PRoW Ref E-354/006/0 and E-354/007/0 is far from clear on how these diversions would work in practice to keep the network of footpaths open and usable during the construction period. The Applicant should be asked to explain this clearly and unambiguously and give details of what surfacing will be provided on these diversions and the likely length of time for diversion.	Details on the likely timeframes for the likely length of time for diversions will be provided in the final PRoW Strategy. As described in section 2.3 of the Outline Public Rights of Way Strategy (REP3-024), this is expected to be for a number of weeks depending on the length of PRoW being temporarily closed.
3	44. Paragraph 16 states that site notices will be erected approximately 1-2 weeks in advance of temporary stopping-up. This is insufficient notice as persons, such as visitors, who do not regularly use the PRoWs will not	The measures described in paragraph 16 of the Outline Public Rights of Way Strategy (REP3-024) are for the very purpose of providing opportunity for visitors to view and understand any temporary closures of

ID	Written Representation	Applicants' Comments
	<p>have the opportunity to see these notices. The period for site notices should be extended to at least one month and full information should be available on a dedicated website.</p>	<p>PRoW. It is the Applicants' view that providing news in local newspapers and engaging with district and local parish councils sufficiently provides this opportunity for visitors.</p>
4	<p>45. The timing of the permanent closure of Footpath 6 (E-354/006/0) is not disclosed, but it would appear that pedestrians will be diverted along the side Grove Road and crossing the haul road during the extensive construction period. This is a significant loss of amenity to residents of Friston who regularly use FP6 for general exercise and to walk their dogs.</p>	<p>The Applicants refer to updated Outline Public Rights of Way Strategy (REP3-024) and Permanent Stopping up of PRoW Plan (REP3-009). The diversion would take PRoW users along a short section of Grove Road before passing through Grove Wood.</p>
5	<p>46. The Applicant has increased the amount of permanent footpath closures from 2 to 3 around the substation site. No reason has been given for the 3rd closure (E-260/017/0) other than "to follow a historic field boundary". This is uncharacteristically altruistic of the Applicant and it would seem more likely that the footpath is to be moved outside the onshore boundary to free up more space in the site for other purposes. The Applicant should provide a full supporting explanation for the permanent closure of part of PRoW E260/017/0.</p>	<p>As stated in the Notice of Intent to Make Non-material or Material Changes (REP1-039), this permanent diversion will re-introduce the historic footpath and historic field boundary in the north western area of the Order Limits, as presented within the 1st edition historic OS map of 1883/84. The Councils and Historic England are supportive of this change.</p>

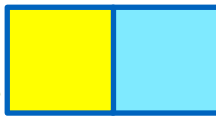
2.5 Sizewell Mitigation Land Clarification Note

ID	Written Representation	Applicants' Comments
The following comments are made by reference to the numbered paragraphs in this note.²		
1	17. Paragraph 5 – a number of statements are made concerning EDF's position but the Applicants provide no documentary evidence of this. To avoid any confusion EDF should be asked to confirm that they agree with the Applicants' statements in paragraph 5 concerning EDF.	Noted. The Applicants refer to Sizewell C's response to further information requested by the Examining Authority following Issue Specific Hearing 2 (REP3-123), which states: <i>SZC Co. has included the land referred to as 'Broom Covert' within its reptile mitigation plan and this land will be used to accommodate the reptiles to be translocated from the land to be used for construction of the Sizewell C power station. This important ecological mitigation land is already providing habitat for a variety of species, as part of the early ecological mitigation that will be relied upon once construction starts. Therefore, this land remains unavailable for development by the Applicant.</i>
2	18. Paragraph 12 third and fourth bullets – these statements are incorrect. Given that EDF were prepared to release the Broom Covert land, the question of compulsory purchase powers was not a relevant consideration. As is clear from subsequent paragraphs in the note, alternative land was available subject to negotiation, which the Applicants chose not to pursue.	The bullets listed under paragraph 12 of the Sizewell Mitigation Land Clarification Note (REP3-076) cover a multitude of constraining factors regarding the Broom Covert land. This is inclusive of the key point that this would be within the Suffolk Coast and Heaths AONB, contrary to National Policy Statement (NPS) EN-1 and National Planning Policy Framework (NPPF) policy.
3	19. Paragraphs 16 – 20 - the Applicants have failed to answer this question and seek rely upon their site selection process which as SASES submitted at	The Applicants refer to their response at ID2 regarding the question on Broom Covert land. The Applicants do not share the view that the site selection process was deeply flawed. Please refer to the responses

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003235-ExA.AS-24.D3.V1%20EA1N&EA2%20Sizewell%20Mitigation%20Land%20Clarification%20Note.pdf>

ID	Written Representation	Applicants' Comments
	ISH2 was deeply flawed – see SASES post hearing submission on site selection ³ .	provided in Table 2.1 of Applicants' Comments on SASES' Deadline 1 Submissions (REP3-072).
4	20. Paragraphs 21 – 26 - it is clear from paragraph 25 that at least one landowner was negotiating with the Applicants to find an alternative reptile mitigation site and those discussions only ended because the Applicants chose to end them. The Applicants have provided no evidence that the acquisition of additional ecological mitigation land “was extremely challenging”.	The Applicants refer back to the key section of paragraph 26 in the Sizewell Mitigation Land Clarification Note (REP3-076) regarding the significant risks associated with the timeline required to secure and prepare the land to be suitable for EDF Energy’s purposes; the significant pre-consent expenditure required to secure the additional mitigation land; and the environmental and policy constraints identified during the Phase 3.5 consultation. These key factors resulted in the acquisition of additional ecological mitigation land being extremely challenging.

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003219-sases%20deadline%203%20Site%20Selection%20Subs%20151220.pdf>

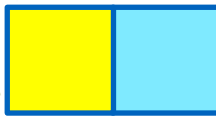


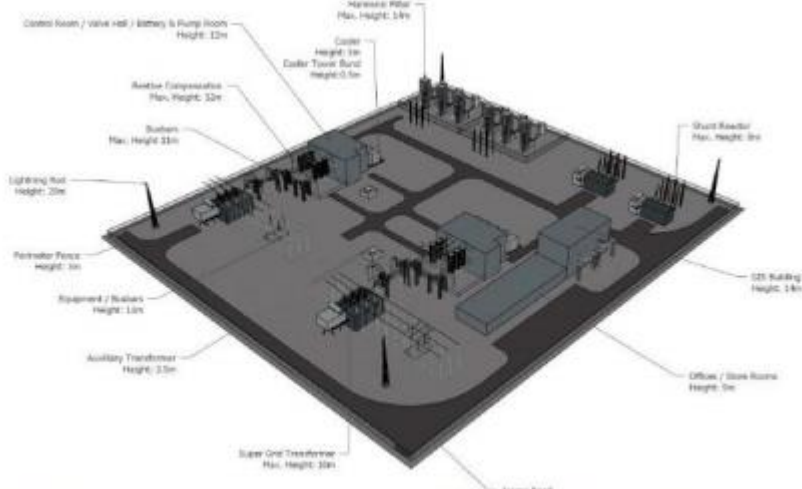
2.6 Design

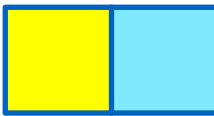
ID	Written Representation	Applicants' Comments																																																												
1	<p>The reduced footprint and height of the proposed substations is noted but:</p> <p>2. The proposed substation area of 3.23ha is substantially greater than the benchmark 2.1ha for an 800MW HVAC substation documented by NGENSO in their report forming part of the recent BEIS Offshore Transmission Network Review (Table 2-24 on page 38 of https://www.nationalgrideso.com/document/182936/download). The increased size needs to be fully justified.</p> <p style="text-align: center;">Table 2-24 Comparison of onshore area requirements</p> <table border="1"> <thead> <tr> <th></th> <th>Typical capacity GW</th> <th>Voltage kV</th> <th>Area ha²⁰</th> <th>Number</th> <th>Total area ha</th> </tr> </thead> <tbody> <tr> <td colspan="6">Integrated</td> </tr> <tr> <td><i>HVDC substations</i></td> <td>2.64</td> <td>525</td> <td>8²¹</td> <td>20</td> <td>160</td> </tr> <tr> <td><i>HVAC substations</i></td> <td>0.8</td> <td>220</td> <td>2.1²²</td> <td>6</td> <td>12.6</td> </tr> <tr> <td><i>Existing interconnector HVDC</i></td> <td>-</td> <td>-</td> <td>-</td> <td>4</td> <td>-</td> </tr> <tr> <td>Total area</td> <td></td> <td></td> <td></td> <td></td> <td>172.6</td> </tr> <tr> <td colspan="6">Counterfactual</td> </tr> <tr> <td><i>HVDC substations</i></td> <td>1.8</td> <td>525</td> <td>5²³</td> <td>57</td> <td>285</td> </tr> <tr> <td><i>HVAC substations</i></td> <td>0.8</td> <td>220</td> <td>2.1</td> <td>48</td> <td>100.8</td> </tr> <tr> <td>Total area</td> <td></td> <td></td> <td></td> <td></td> <td>385.8</td> </tr> </tbody> </table>		Typical capacity GW	Voltage kV	Area ha ²⁰	Number	Total area ha	Integrated						<i>HVDC substations</i>	2.64	525	8 ²¹	20	160	<i>HVAC substations</i>	0.8	220	2.1 ²²	6	12.6	<i>Existing interconnector HVDC</i>	-	-	-	4	-	Total area					172.6	Counterfactual						<i>HVDC substations</i>	1.8	525	5 ²³	57	285	<i>HVAC substations</i>	0.8	220	2.1	48	100.8	Total area					385.8	<p>The information (benchmark footprint for an 800MW High Voltage Alternating Current (HVAC) substation) in the DNV GL report, carried out on behalf of National Grid Electricity System Operator (NG-ESO), is based on a scaled down Hornsea One project (1200MW), and as such it is addressed below.</p>
	Typical capacity GW	Voltage kV	Area ha ²⁰	Number	Total area ha																																																									
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2	<p>3. Further by way of comparison the area required for the Hornsea 1 substation (1200MW HVAC and therefore 50% more powerful than EA1N) is smaller at 3.22ha than the 800MW design proposed for EA1N even after the reduction in area from 3.61ha to 3.23ha. Extracts from: The Hornsea One Offshore Wind Farm Order 2014 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010033/EN010033-002062-Hornsea%20Project%20One%20Offshore%20Wind%20Farm%20Order%202014%20as%20made.pdf</p>	<p>Meaningful comparisons cannot currently be drawn between Hornsea and the Projects, mainly because:</p> <ul style="list-style-type: none"> The Projects' substation design envelopes (footprints) are the result of the conceptual design system studies and are formed by early information obtained from the supply chain, whereas Hornsea reflects that of a final 																																																												

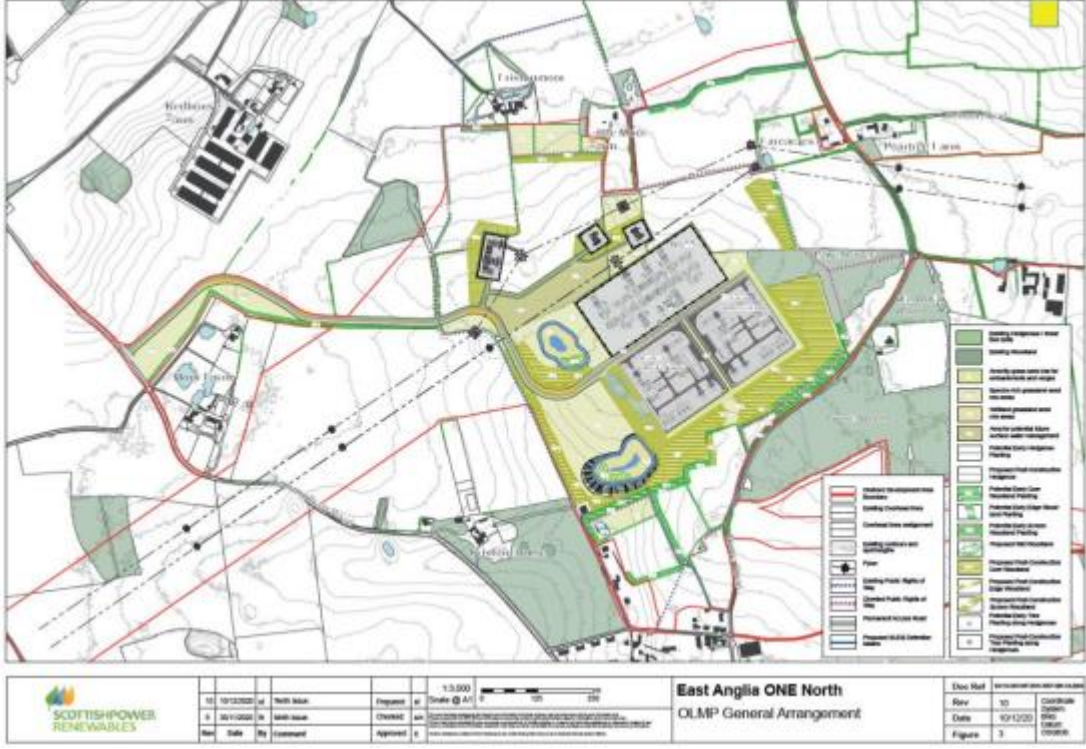


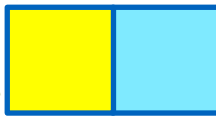
ID	Written Representation	Applicants' Comments
	<p><i>The nationally significant infrastructure project comprises two or, subject to paragraph 3, three offshore wind generating stations with a combined gross electrical output capacity of up to 1,200 MW as follows—</i></p> <p>Work No. 10 — <i>an electrical transmission station including a building abutting an open yard (which may be partitioned with concrete or steel walls or fences containing switchgear, electrical reactors and other electrical equipment) on land adjoining the North Killingholme National Grid substation. If the electrical circuits comprised in Works Nos. 6, 7 and 9 are HVDC, the electrical transmission station will include facilities to convert the current to HVAC.</i></p> <p><i>(23) The site of Work No. 10 must not cover more than 32,200 m2 in area, excluding any area of land required for landscaping and mitigation.</i></p>	<p>(as-built) and hence fully optimised design envelope specific to the Hornsea project;</p> <ul style="list-style-type: none"> • The design of the Hornsea project is quite different from the Projects, as it includes options for interim reactive compensation stations; and • Substation design is subject to a number of standards on safety, security of supply (reliability) and efficiency. The Applicants are confident that these standards will be met through the design process being applied.
3	<p>4. The 3D schematic (Plate 5.2 of [REP3-057]) and revised OLMP (Figure 3 of [REP3-030]) both show large areas of vacant substation area between the reduced sized electrical equipment. The Applicants are asked to justify why the equipment spacing is so great and why there is no reduction in the 190m dimension. It should be noticed that the orientation of the 3D schematic in plate 5.2 is different from the orientation of both the eastern and western substation shown in the OLMP.</p>	<p>A comparative assessment of the Projects' substation design envelopes with that of the already constructed East Anglia ONE project was used to determine a preliminary, worst-case onshore substation footprint. This was further refined through conceptual electrical design (power systems) studies that were carried out to determine key reference parameters to guide the onshore substation concept sizes. The studies were based typically on assumed component parameters, early stage supplier engagement information and experience gained from similar projects, in order to form the onshore substation conceptual design envelope of 190m x170m.</p>



ID	Written Representation	Applicants' Comments
	 <p>Plate 5.2: 3D model of the updated easternmost onshore substation showing reduced footprint and building / equipment parameters</p>	<p>With regards to equipment spacing, this is subject to detailed system studies, substation design and rigorous supply chain engagement, to inform the design envelope of:</p> <ul style="list-style-type: none"> Final dimensions/size of the main electrical equipment to be used, and hence the necessary safety clearances that need to be adhered to within the substation compound; High voltage cable management requirements for planned/unplanned maintenance (contingency), that are in covered trenches and not visible above ground, and should not be built upon (hence the seemingly “large areas of vacant substation space” quoted in the relevant comment); and Additional certainty in the sizes of filters and reactive compensation, as grid compliance is not granted until well after wind farm operation. <p>With regards to substation orientation, this will be selected in such a way to accommodate efficiently the incoming (underground) 275kV cables from the windfarm, as well as the outgoing cables that will connect to the National Grid substation, thus minimising cable</p>

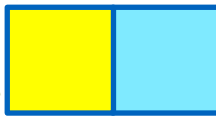


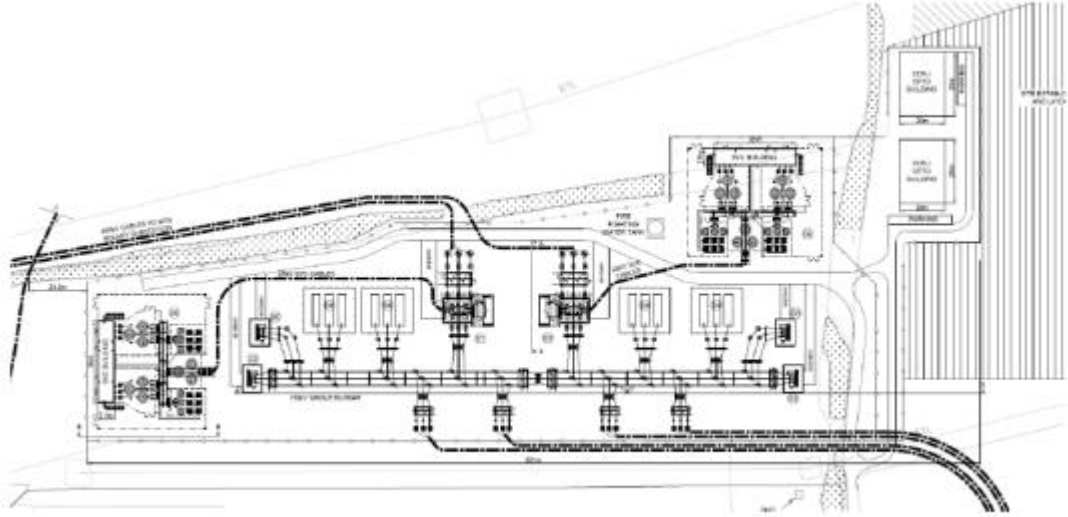
ID	Written Representation	Applicants' Comments
		<p>length where appropriate and additional space within the substation.</p>
4	<p>5. In Q5 of page 32 of https://www.nationalgrideso.com/document/182921/download, in NGESO feedback related to the BEIS OTNR Review, a participant has commented 'We would also highlight that harmonic instabilities can be worsened at 275 KV. It is also not clear what benefit there would be of a higher voltage substation as it would drive larger switchgear'. These would appear to be significant arguments against the choice of 275kV rather 220kV as the system voltage for the projects due to the impact on the design of the onshore substations.</p>	<p>The Applicants refer to additional information provided in the Substations Design Principles Statement submitted at Deadline 4 (REP4-029) regarding the estimated finished ground levels and maximum visual envelope. The Applicants have carried out detailed analysis of the voltage selection. For each</p>

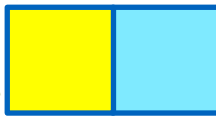


ID	Written Representation	Applicants' Comments
		<p>Project the transmission distances are lower than Hornsea, as such the capacitive charging is much lower and the need for interim compensation platform not required.</p> <p>In addition, the Applicants note:</p> <ul style="list-style-type: none"> • Harmonics are not only relevant to voltage. Three cables in Hornsea versus the same number of cables versus capacitance of Hornsea connection higher than the Projects; • Opting for 275kV brings certain benefits to the substation footprint size as it reduces the number of circuits and equipment requirements for the given capacity.
5	<p>6. The Applicants are asked to confirm that the revised design is based on the optimum use of the latest 'compact' GIS switchgear equipment, as a yet greater height reduction would be highly desirable</p>	<p>The Applicants cannot currently confirm what the final design/selection of the GIS would be as the optimisation of the design is underway through supply chain engagement and relevant system studies. However, GIS equipment sizing will be based on the current technology offerings available from the supply chain.</p> <p>The Applicants will progress its procurement and detailed design process in due course and will consider viable solutions for the onshore substation within the permitted extent of the Projects' DCOs and in doing so will seek to</p>

ID	Written Representation	Applicants' Comments
		further minimise the environmental impacts of the Projects.
6	7. The reference Rampion wind farm substation design (Figure 3 on page 165 of [REP1- 227]) appears to use multiple smaller Harmonic Filters in order to produce an overall reduction in height. Has this option been explored?	<p>The Applicants refer to section 6.2 of the Substations Design Principles Statement submitted at Deadline 4 (REP4-029). A 4m reduction in the height of the harmonic filters has been achieved.</p> <p>The Applicants will progress its procurement and detailed design process in due course and will consider viable solutions for the onshore substation within the permitted extent of the Projects' DCOs and in doing so will seek to further minimise the environmental impacts of the Projects.</p>
7	8. There is not thought to be any specific reason why the substation footprint has to be rectangular. The footprint of the reference Rampion wind farm substation (Figure 3 on page 165 of [REP1-227] and reproduced below) is not rectangular; rather it has been designed to fit within existing site hedgerow boundaries, so avoiding unnecessary environmental destruction and maximum use of existing screening. Have the Applicants given consideration to this approach?	<p>Rectangular substations are the standard approach, which leads to certain benefits in utilising efficiently the space within the substation compound (in terms of equipment siting, cables laying and relevant safety clearances).</p> <p>The Applicants refer to their response provided at ID3 of this table with reference to their responses to Examining Authority's Written Questions Volume 2 – 1.0 Overarching, general and cross-topic questions (REP1-105). Minimum spacings are required for safe and efficient construction and operation.</p>



ID	Written Representation	Applicants' Comments
	 <p data-bbox="264 863 376 895">Figure 3</p>	
8	<p data-bbox="264 932 1442 1102">9. Landscape design and ‘micro-siting’ with a further reduced substation footprint together with the GIS version of the proposed NGET substation could allow a much reduced landtake for the project, and some potential layouts on this basis might allow retention of the ‘Pilgrim’s Way’ north-south footpath. The current proposals are regarded as unacceptable over-development of a greenfield site and contrary to the policy requirements of good design.</p>	<p data-bbox="1496 932 2051 1174">The Applicants refer to their responses provided to Q1.0.5 and Q1.0.12 of Examining Authority’s Written Questions Volume 2 – 1.0 Overarching, general and cross-topic questions (REP1-105) regarding land take and the need for AIS at the National Grid substation and Q1.0.1b regarding good design.</p>
9	<p data-bbox="264 1208 1442 1378">10. Finished ground levels – the revised finished ground levels need to be treated with caution given the surface water flood risk at the substation site and the qualification within the Project Update Note at paragraph 10 that there is a need for “future geotechnical and detail design studies to be undertaken (in order to establish the soil properties, bearing capacity, groundwater levels etc.), [emphasis added]. In addition the revised finished ground levels are only expressed to apply to the</p>	<p data-bbox="1496 1208 2051 1378">Further information regarding the estimated finished ground levels is provided in Section 6 of the Substations Design Principles Statement submitted at Deadline 4 (REP4-029).</p>



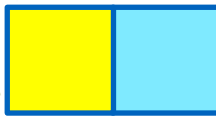
ID	Written Representation	Applicants' Comments
	<p>National Grid substation not the remainder of the National Grid connection hub such as the cable sealing ends. Also given that it is stated at paragraph 7 of the Project Update Note that "It has not been possible at this stage to reduce the heights of buildings or external equipment within the National Grid substation as National Grid has not yet progressed their design from that submitted with the Applications" it is difficult to understand on what basis the revised finished ground level for the National Grid substation has been determined. Furthermore finished ground levels are neither defined nor specified in the draft DCO.</p>	
10	<p>11. Given plate 5.2 sets out the heights of more structures than set out in the DCO these heights should be specified in Part 3 of Schedule 1 - Requirements of the DCO otherwise the heights of the structures could be increased to 14 metres.</p>	<p>The Applicants refer to the Substations Design Principles Statement submitted at Deadline 4 (REP4-029).</p>
11	<p>12. All the above support the need for a 'Design Champion' or other equivalent arrangements to ensure best possible use of the Friston site, should this be consented.</p>	<p>A Design Champion has been committed to by the Applicants, as detailed in Section 5.2 of the Substations Design Principles Statement (REP4-029).</p>

2.7 Cultural Heritage

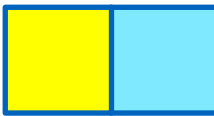
ID	Written Representation	Applicants' Comments
Please see report from Richard Hoggett Heritage attached at Appendix 2. ⁴		
Introduction		
1	1.1 This addendum to the Cultural Heritage Assessment prepared by Richard Hoggett Heritage for SASES, dated October 2020 and submitted at Deadline 1, addresses the effects of several minor changes to the proposed design of the pair of substations, National Grid substation and associated infrastructure intended to be located at Friston.	1.1 – 1.4 – Noted.
2	1.2 Details of these changes were set out in a Project Update Note (REP2-007), submitted by the applicant at Deadline 2, and the Onshore Substations Update Clarification Note (ExA.AS-11.D3.V1), submitted by the applicant at Deadline 3.	
3	1.3 These documents set out three main changes to the proposals which have the potential to affect the conclusions of the submitted Cultural Heritage Assessment. Specifically, these changes are: <ul style="list-style-type: none"> • a reduction in the footprint of each of the onshore substations and their resulting relocation; • the lowering of the finished ground levels at the locations of the eastern onshore substations and National Grid substation; • a reduction in the maximum heights of the buildings and external equipment at both onshore substations. 	
4	1.4 These changes are reflected in a series of updated photomontages which were also submitted at Deadline 3.	

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-003512-sases%20deadline%204%20rh%20East%20Anglia%20ONE%20North%20and%20East%20Anglia%20TWO%20-%20Heritage%20Addendum%20-%20v1.pdf>

ID	Written Representation	Applicants' Comments
Reduction in footprint		
5	2.1 As was set out in the Project Update Note (REP2-007), submitted by the applicant at Deadline 2, the design of the onshore substations has been refined so that the footprint of each station has been reduced from 190m x 190m (36,100 m ²) to 190m x 170m (32,300m ²).	2.1 – 2.5 – Noted.
6	2.2 This reduction has facilitated the micro-siting of the onshore substations to optimise their position relative to the surrounding landscape, specifically the siting of the substations slightly further to the west than originally intended. Further details are set out in the Onshore Substations Update Clarification Note, dated 15th December 2020 and submitted by the applicant at Deadline 3.	
7	2.3 This reduction in footprint and associated relocation enables the retention of an established area of woodland situated to the west of the substation site, which would otherwise have been removed. The applicant states that the woodland will provide additional visual screening of the onshore substations and National Grid substation in views from the south and west.	
8	2.4 An additional open space to the south of this woodland has been integrated into the Outline Landscape and Ecological Management Strategy and will see post-construction screening woodland planted in this area.	
9	2.5 Although the submitted documents present a summary assessment of the impact of these changes on Landscape and Visual Amenity, Onshore Ecology, and Hydrology, Hydrogeology and Flood Risk, no mention is made of the proposals affecting the impact on Cultural Heritage.	At Deadline 4 the Applicants submitted a Heritage Assessment Addendum (REP4-006). This presented the results of the revised assessment of impacts on the significance of heritage assets in the vicinity of the onshore substations due to changes in their settings.
10	2.6 Examination of the proposed reduced footprint of the two onshore substations presented in the Onshore Substations Update Clarification Note against the existing proposals indicates that all of the	The Applicants refer to the Onshore Substations Update Clarification Note (REP3-057) as this document details the proposed changes to the onshore substations.



ID	Written Representation	Applicants' Comments
	change is lateral and only represents a north-eastwards movement of the western onshore substation along the same access.	Figure 1 shows the relocation of the onshore substations, and whilst there is lateral movement of the western substation, there is also an overall footprint reduction. Table 3.1 , Table 3.2 and Table 4.2 within the Onshore Substations Update Clarification Note (REP3-057) also detail a reduction in the maximum substation heights.
11	2.7 In terms of any changes to the heritage impacts identified as part of the original Cultural Heritage Assessment, these changes do nothing to affect the impact which the proposed development of the substations will have on the Grade II-listed Little Moor Farm (National Heritage List Entry No. 1215743) and High House Farm (National Heritage List Entry No. 1216049) to the north, indeed, the National Grid substation and associated infrastructure which lie closest to these buildings will be unchanged	As detailed in Table 2 of the Heritage Assessment Addendum (REP4-006) the residual impacts on Little Moor Farm after the implementation of landscape mitigation will be reduced to a low adverse magnitude of impact and a minor significance of effect. With regards to High House Farm, the relocation of the onshore substations has not changed the magnitude of impact or significance of effect, meaning it can still be concluded that the adverse impact will be of low magnitude and therefore of minor significance .
12	2.8 Similarly, although the revision will result in a slight relocation of the southwestern corner of the substation complex, it will not result in sufficient differences to alter the impact which the scheme will have upon the Grade II*-listed church of St Mary (National Heritage List Entry No. 1287864) and the Grade II-listed Friston War Memorial (National Heritage List Entry No. 1435814) to the south.	As detailed in Table 2 of the Heritage Assessment Addendum (REP4-006) the relocation of the onshore substations will not alter the conclusions around the magnitude of impact and significance of effect to these heritage assets determined in the ES (APP-519; APP-520). As detailed in Table 3 of the



ID	Written Representation	Applicants' Comments
		<p>Heritage Assessment Addendum (REP4-006), after mitigation, the Church of St Mary's will still see an adverse impact of low magnitude which will result in an effect of moderate significance. The Friston War Memorial will see an adverse impact of negligible magnitude which will result in an effect of minor significance.</p>
13	<p>2.9 The retention of the mature woodland to the west of the western onshore substation will have an additional screening effect between the substation site and the Grade II-listed Friston House (National Heritage List Entry No. 1216066), but this is not considered to be sufficiently great as to reduce the heritage impact of the scheme upon Friston House from the level identified in the initial Cultural Heritage Assessment. Likewise, although the retained woodland will have a slight additional screening effect for the Grade II-listed Woodside Farm, this is again not sufficiently great as to reduce the identified level of heritage impact.</p>	<p>As detailed in Table 3 of the Heritage Assessment Addendum (REP4-006) the reduction in maximum heights would further reduce the already very limited impact that the onshore substations will have on Friston House. Friston house will see an adverse impact of negligible magnitude which will result in an effect of minor significance.</p>
<p>Finished ground levels</p>		
14	<p>3.1 A second change set out in the submitted documents is the lowering of the finished ground levels at two of the three substation sites. These result in a potential reduction of 2m on the site of the eastern onshore substation, 0.7m at the National Grid substation and no change in the finished ground level of the western onshore substation. It should be emphasised that these figures are estimated.</p>	<p>In the Onshore Substations Update Clarification Note (REP3-057), which the Heritage Assessment Addendum (REP4-006) refers to for further information about the onshore substation design updates, the Applicants state:</p> <p><i>"In particular, the estimated finished ground levels have been reviewed and it has been possible to lower these at two of the substation locations".</i></p>



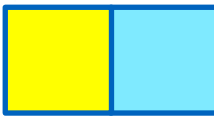
ID	Written Representation	Applicants' Comments
15	3.2 It is argued that these reductions will result in a reduction in visibility and the resulting visual effects, and these changes are reflected in the updated photomontages submitted at Deadline 3.	Noted.
16	3.3 Again, the potential for these changes to reduce the heritage impact of the proposed development schemes is extremely limited. There is no material reduction to the height of the western onshore substation, which lies closest to Friston House, Woodside Farm, the church of St Mary and the Friston War memorial. The western onshore substation is also clearly visible from Little Moor Farm and High House Farm to the north, and this will also remain unchanged.	<p>In the <i>Onshore Substations Update Clarification Note</i> (REP3-057), the Applicants state:</p> <p><i>“To determine the revised estimated finished ground levels, while remaining cognisant of engineering constraints, it has been necessary to achieve a balance between the potential environmental impacts, ensuring that the benefits that can be secured for one discipline do not create result in adverse impacts for another”.</i></p> <p>Additionally, heritage assets were not the only consideration when the onshore substation designs was revised. Other elements such as onshore ecology and hydrology, hydrogeology and flood risk were also considered and will be bettered as a result.</p>
17	3.4 The National Grid substation lies to the north of onshore substations, and consequently has the greatest impact upon High House Farm and Little Moor Farm, although it is also visible from Friston House and, potentially, Woodside Farm. It is considered that the 0.7m reduction in the ground level of the National Grid substation will have a negligible effect in reducing the heritage impact of the scheme. Indeed, it will have the effect of exposing more of the adjacent western onshore substation in views from the north.	<p><i>Heritage Assessment Addendum Appendix 2</i> and <i>Heritage Assessment Addendum Appendix 3</i> of the <i>Heritage Assessment Addendum</i> (REP4-006) show two viewpoints from the north. As shown within these two appendices, once landscape mitigation has been undertaken the residual impact will be</p>



ID	Written Representation	Applicants' Comments
		<p>low to negligible with a minor significant effect. As shown within Figure 1 of the Onshore Substations Update Clarification Note (REP3-057), the views of the western onshore substation from the north will be reduced.</p>
18	<p>3.5 The potential 2m reduction to the ground level of the eastern onshore substation will have a marginal effect upon the visibility of the structure in views southwards from Little Moor Farm, but these changes are not considered to be substantive enough to affect the assessment of heritage impact presented in the original Cultural Heritage Assessment.</p>	<p>It is the Applicants' view that the 2m reduction provides betterment with regard to heritage impacts. Prior to the 2m reduction in ground level, with landscape mitigation the residual adverse effect would have been of moderate effect. With the 2m reduction in ground level and after landscape mitigation, the residual adverse effect will be reduced to minor significance (Table 3 of the Heritage Assessment Addendum (REP4-006)).</p>
Building and equipment parameters		
19	<p>4.1 A third change pertains to the reduction of the maximum building and external equipment parameters at the onshore substations, but not, it should be noted, at the National Grid substation.</p>	<p>The Deadline 3 Project Update Note (REP3-052) states that it has not been possible at this stage to reduce the heights of buildings or external equipment within the National Grid substation as National Grid has not yet progressed their design from that submitted with the Applications (REP3-111).</p>



ID	Written Representation	Applicants' Comments
20	4.2 These changes include a 4m reduction in the height of the harmonic filters (to 14m), a 5m reduction in lightning protection masts (to 20m), a 3m reduction to the statcom building (to 12m) and a 1m reduction to the GIS building (to 14m).	4.2 – 4.3 – Noted.
21	4.3 These revised heights are also reflected in a series of updated photomontages submitted at Deadline 3.	
22	4.4 Again, it is considered that none of these changes in height is sufficiently great as to be able to materially reduce the impact of the proposed schemes on the surrounding listed buildings enough to affect the assessment of heritage impact presented in the original Cultural Heritage Assessment.	As presented in the Heritage Assessment Addendum (REP4-006), the Applicants have undertaken a revised assessment of the onshore substations which concluded that the overall impact on heritage assets will be reduced.
Conclusion		
23	5.1 While the proposed changes to the development schemes are welcomed, ultimately it is concluded that the proposed reduction to the footprint of each of the onshore substations and their resulting relocation, the lowering of the finished ground levels at the locations of the eastern onshore substations and National Grid substation, and the reduction the maximum heights of the buildings and external equipment at both onshore substations will not be substantive enough to reduce the assessments of heritage impact presented in the original Cultural Heritage Assessment.	As presented in the Heritage Assessment Addendum (REP4-006), the Applicants have undertaken a revised assessment of the onshore substations which concluded that the overall impact on heritage assets will be reduced.
24	5.2 For reference, these impacts are summarised, together with those of the applicant, in the table below and full details of each assessment can be found in the Cultural Heritage Assessment undertaken by Richard Hoggett Heritage and submitted by SASES at Deadline 1 (PINS Refs: 20024106 & 20024110).	Noted.



ID		Written Representation				Applicants' Comments	
Heritage Asset	Heritage Importance	Applicant's Assessment		My Assessment			
		Magnitude of Impact	Significance of Effect	Magnitude of Impact	Significance of Effect		
Church of St Mary	High (II*)	Low	Moderate	High	Major		
Friston War Memorial	Medium (II)	Negligible	Minor	Medium	Moderate		
Little Moor Farm	Medium (II)	Medium	Moderate	Medium	Moderate		
High House Farm	Medium (II)	Low	Minor	Medium	Moderate		
Friston House	Medium (II)	Negligible	Minor	Low	Minor		
Woodside Farmhouse (EA1N)	Medium (II)	Medium	Moderate	Medium	Moderate		
Woodside Farmhouse (EA2)	Medium (II)	Low	Minor	Medium	Moderate		
Friston Post Mill	High (II*)	Negligible	Minor	Negligible	Minor		

2.8 Flood Risk

ID	Written Representation	Applicants' Comments
Outline Operational Drainage Management Plan		
1	27. Please see comments from GWP Consultants at section 3.1 of their report entitled Flood Risk Related Comments on Deadline 3 Submissions at Appendix 3.	Noted.
Outline Code of Construction Practice		
2	Please see comments from GWP Consultants at section 3.2 of their report entitled Flood Risk Related Comments on Deadline 3 Submissions attached at Appendix 3.	Noted.
Appendix 3		
3	<p>The Applicant repeatedly referred in Deadline 2 submissions to surface water flood risk mitigation measures being provided in an Outline Operational Drainage Management Plan (OODMP) which would be submitted as part of Deadline 3. This is now available as a Deadline 3 submission.</p> <p>The Applicants' OODMP is a 38 page document containing a brief description of the current site and watershed characteristics, a policy framework overview, an introduction to sustainable drainage principles and 1 page of summary calculations.</p>	Noted.
4	This document is not a drainage plan, it simply articulates a drainage strategy which includes various options, without demonstrating the achievability of any options. There is not even an outline conceptual	The Applicants reiterate that the Outline Operational Drainage Management Plan submitted at Deadline 3 (REP3-046) is 'outline' and that the final design will be presented in the final Operational Drainage Management Plan which will be submitted to the relevant planning

ID	Written Representation	Applicants' Comments
	<p>drainage scheme layout provided. The summary calculation sheet has no supporting calculations and appears to not include infiltration at all.</p>	<p>authority for approval as secured under Requirement 41 of the draft DCO (REP3-011).</p> <p>Section 6 of the Outline Operational Drainage Management Plan (REP4-003) provides a summary of the achievability of an attenuation Sustainable Drainage Systems (SuDS) design for the onshore substations and National Grid infrastructure. This demonstrates that there is flexibility in the presented attenuation design to accommodate a range of agreed controlled discharge rates which will not exceed the pre-development greenfield run off rate. The Applicants will base its surface water discharge design on a commitment to not exceed the pre-development greenfield run off discharge to the Friston Watercourse, and design the SuDS basis to reflect this rate and the infiltration rate established during the detailed design stage. An updated Outline Operational Drainage Management Plan (REP4-003) will be provided at Deadline 6.</p>
5	<p>This document provides no further details than those previously provided in earlier Submissions. It provides no evidence that infiltration is achievable and the only calculations appear to suggest all attenuated water will be released to the local water course – thus significantly increasing the TOTAL flows generated from the site and entering Friston Village.</p>	<p>All matters relating to infiltration are provided in the SuDS Infiltration Clarification Note submitted at Deadline 4 (REP4-044).</p> <p>For clarity, the Applicants first considered infiltration in accordance with the SuDS Design Guidance (Suffolk County Council, 2018) hierarchy. Until further ground investigations and percolation testing have been conducted, an infiltration only scheme is currently unviable due to the conservative soak rate of 10mm/hr used in the modelling and the requirement to achieve a half drain time within 24hrs.</p> <p>The Applicants have therefore presented an attenuation only scheme as a worst-case in the Outline Operational Drainage Management Plan (REP4-003). It remains the Applicants' position that the final SuDS design will incorporate both infiltration and attenuation design measures with a connection to the Friston watercourse. By adopting infiltration and</p>

ID	Written Representation	Applicants' Comments
		attenuation within the final SuDS design and limiting runoff rates from the site to the pre-development QBAR rate for all return period events, up to and including the 1 in 100 year plus climate change scenario, the Applicant has considered Total flows from the site.
6	It is noteworthy the Applicant identifies the October 2019 flood event in Friston as only a 1 in 40 year return period event – that is to say the actual flood events to which the proposed development must provide mitigation of 1 in 100 Year +40%, are considerably larger.	The return period of the October 2019 rainfall event in Friston (section 3.6.1.3 of the Outline Operational Drainage Management Plan (REP4-003) is correct. This is based on advice received from SCC. The indicative SuDS design for the onshore substations and National Grid substation is designed to a 1 in 100 year + 20% scenario as stipulated by the SuDS a Local Design Guide Appendix A to the Suffolk Flood Risk Management Strategy (Suffolk County Council, 2018), including an exceedance check using 40% for climate change. This would be reflected in the final design which will be presented in the final Operational Drainage Management Plan post consent.
7	The Applicant has also included a surface water flood risk map, which clearly shows the overland flow routes hydraulically linking the proposed development site to the water courses flowing through Friston Village.	The Applicant notes that there is a surface water flow route from the onshore substations and National Grid substation site, and this has been assessed within the Flood Risk Assessment (APP-496). It is also noted that within the Statement of Common Ground (SoCG) with the Councils, the following statement has been agreed: <i>Flood events in the Friston area, resulting from overland flow, that occurred during late 2019 – early 2020 was a result of multiple flow paths and not a direct result of surface water runoff from land associated with the proposed site of the onshore substation or the National Grid infrastructure.</i>
8	It is entirely inadequate to provide this document as assurance of mitigation of surface water flood risk associated with the proposed development, on Friston Village. The document contains no details of flood	A flood risk assessment and an impact assessment are presented in Flood Risk Assessment (APP-496) and Chapter 20 Water Resources and Flood Risk (APP-068) respectively.

ID	Written Representation	Applicants' Comments
	risk assessment or impact, nor adequacy or achievability of mitigation measures.	
9	As its title suggests, the OODMP completely omits to consider the construction phase, with its wider footprint area and greater likelihood of mobilising sediment laden storm run-off water.	Mitigation measures relevant to the construction phase are provided in section 11 of the Outline Code of Construction Practice (REP3-022). It is not the purpose of the Outline Operational Drainage Management Plan (REP4-003) to cover the construction period.
SPR Outline Code of Construction Practice		
10	The Outline CoCP is a 60+ page document outlining proposed construction practices to be adopted by the Applicant. The OCoCP states a Surface Water and Drainage Management Plan and Flood Management Plan will be produced as part of the final CoCP.	Noted.
11	The OCoCP contains general statements about proposed sediment containment, pollution prevention and storm flow management options and on-site construction practices.	
12	A reference to the controlled run-off rate being at least the equivalent greenfield run-off rate, is ambiguous and makes no mention of TOTAL flow increase and reduction through infiltration.	Section 4.9 of the Outline Operational Drainage Management Plan identifies a specific pre-development (greenfield) runoff rate for a number of return period events including the QBAR runoff peak flow (QBAR) rate. The Applicants have committed to a SuDS design incorporating a discharge rate which will not exceed the pre-development (greenfield) QBAR runoff rate for all return period events. By adopting infiltration and attenuation within the final SuDS design and limiting runoff rates from the site to the pre-development QBAR rate for all return period events, the Applicant has considered Total flows from the site.

ID	Written Representation	Applicants' Comments
13	The OCoCOP provides no details on construction phase surface water management, no scheme designs, no design parameters, no sizing, and no evidence the general statements and practises can actually be realised within the constraints of the site.	<p>Section 11 of the Outline Code of Construction Practice (REP3-022) provides details on outline surface water management measures. Further information on detailed design will be provided in the final Code of Construction Practice as secured under Requirement 22 of the draft DCO (REP3-011).</p> <p>The Applicants refer to their response provided at ID1 of section 2.4 of Applicants' Comments on the Councils' Deadline 3 Submissions (REP4-003) regarding surface water management during construction.</p>
SPR Comments on SASES Deadline 1 Submissions		
14	The Applicant provides 20+ pages of comments on SASES Deadline 1 Submissions relating to flood risk of Friston.	Noted.
15	The Applicant's main responses are to refer to the Outline CoCP and the Operational Drainage Management Plan – both documents reviewed in earlier sections of this report.	
16	The Applicant also refers to having undertaken a Flood Risk Assessment in accordance with EN-1. This is self-evidently not the case – the Applicant has not considered TOTAL run-off flows leaving the proposed site (5.7.21) and has not demonstrated the TOTAL flows can be reduced to pre-development rates (5.7.22).	A Flood Risk Assessment (APP-496) was provided with the Applications. As noted in ID12, by adopting infiltration and attenuation within the final SuDS design and limiting runoff rates from the site to the pre-development QBAR rate for all return period events, the Applicants have considered Total flows from the site. This will be through the use of infiltration / SuDs (in accordance with the guidance on Volume Control set out in the SuDS a Local Design Guide, Appendix A to the Suffolk Flood Risk Management Strategy (Suffolk County Council, 2018)) / control discharge to the Friston watercourse, by limiting discharge from the site to the QBAR rate for all events up to and including the 1 in 100 year plus climate change scenario.

ID	Written Representation	Applicants' Comments
17	The Applicant also advises in its responses to SASES comments that in the SOCGs it has the agreement of the Councils that it has adequately characterised the baseline environment in terms of flood risk. Again it is self-evident from SCC submissions to Deadline 3 that they have significant concerns about the Applicant's assessment of surface water flood risk and its mitigation.	The Applicants are continuing to engage with SCC through the SoCG process.
18	The Applicant routinely responds stating the site is in Flood Zone 1 and the Environment Agency has no objections. This is an evasive and irrelevant argument – the EA is not responsible for and therefore will not comment on surface water storm run-off.	Noted.
19	The Applicant references a number of industry best practise documents but fails to recognise that infiltration capacity on site is unproven and that consequently the viability of the infiltration basin option is unproven.	The Applicants refer to ID5 of this table.

2.9 Responses to Hearings Action Points

ID	Written Representation	Applicants' Comments
Please see comments from Michelle Bolger, Expert Landscape Consultancy in landscape briefing note 5 attached at Appendix 1 ⁵ , page 7.		
EN010077-003238-ExA.HA.D3.V1 EA1N&EA2 Applicants Responses to Hearings Action Points (ISH1, CAH1, ISH2) ⁶		
1	30. The Applicants accept that the A12 does not exert a local influence on the character of the site and point out that it is not described as doing so in the 'subsequent local level assessment in the LVIA (Chapter 29) (APP-077)' 14. This is exactly the point that was being made at the Hearing, that judgements made during the RAG assessment were fundamentally flawed and that the choice of Friston as the location for the substations is unsound.	The Applicants disagree with SASES' comments regarding the RAG process. Please refer to section 2.5 of EA1N&EA2 Applicants' Comments on Substation Action Save East Suffolk (SASES) Deadline 1 Submissions (REP3-072).
2	31. It is for the ExA to decide whether the features described on pages 28-20, apart from the high voltage transmission line, are genuine detractors from the rural character of the landscape surrounding Friston.	Noted.

⁵ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-003510-sases%20deadline%204%20mb%201080%20BN05%20Deadline%203%20Responses%20Final%20R1.pdf>

⁶ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003238-ExA.HA.D3.V1%20EA1N&EA2%20Applicants%20Responses%20to%20Hearings%20Action%20Points%20\(ISH1,%20CAH1,%20ISH2\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003238-ExA.HA.D3.V1%20EA1N&EA2%20Applicants%20Responses%20to%20Hearings%20Action%20Points%20(ISH1,%20CAH1,%20ISH2).pdf)

2.10 Noise

ID	Written Representation	Applicants' Comments
Applicants' Response to Appendix 4 of the Local Impact Report		
1	29. Given that the Applicants have still not responded to SASES Written Representation in relation to noise submitted at Dealine 1 (but have expressed an intention to do so at Deadline 4) and given that ISH4 will focus on noise issues, SASES will comment on this response at Deadline 5 as part of its post hearing submissions	Noted.

2.11 Draft DCO

ID	Written Representation	Applicants' Comments
Draft Development Consent Order		
1	47. SASES provided written representations at deadline 1 (2 November 2020) and yet the Applicants will not provide any comments until Deadline 4 (13 January 2021). SASES reserves its rights to comment on the revised draft DCO submitted at Deadline 3 until it has received the Applicants' comments on its written representations. Notwithstanding such a reservation SASES would make the following initial comments on the revised draft.	No further comment.
2	48. Article 33 - It would be appreciated if an explanation for the amendment to article 33 could be provided.	The Applicants undertook a review of all cross references within the draft DCO (an updated version has been submitted at Deadline 5, document reference 3.1) and this amendment was made to reflect the correct title of section 264 of the 1990 Act. The amendment to article 33 therefore reflects an update to the cross reference to better reflect the provision referred to and does not result in any change to the article.
3	49. Article 38 – see comments on Schedule 16 below	See below.
4	50. Paragraph 38 of Part 3 of Schedule 1 - In the context of cumulative impact it should be noted that article 38 has been amended so that the grid connection works might be constructed under any other development consent order. The original drafting understandably only referred to each Applicant's respective DCO. The only motivation for such a change is that the Applicants (or more likely National Grid) envisage that a DCO for a project other than EA1N or EA2 will be applied for in the immediate future. This will also contain rights to construct the grid connection works at Friston and National Grid would prefer to exercise the rights under that	Requirement 38 states that where any part of the grid connection works are being or have been constructed under another development consent order, that part of the grid connection works must not be constructed under this Order. Requirement 38 was amended to refer to the grid connection works being constructed under "another development consent order". The text originally referred specifically to the DCO for the other East Anglia project. This change was made following a request from National Grid Ventures through the SoCG process and following careful consideration,

ID	Written Representation	Applicants' Comments
	<p>other order rather than the rights being granted under the EA1N and EA2 DCOs. A reasonable conclusion is that the DCO application which National Grid Ventures is bringing forward will also contain the rights to construct the grid connection works which yet again indicates that the Friston grid connection works are a new National Grid connection hub.</p>	<p>the Applicants considered that the requirement was better expressed this way given the ownership of the overhead line infrastructure within the area.</p> <p>The change makes no practical difference to the control mechanism within the DCO, the intention of which is to secure that the national grid connection works can only be constructed once.</p>
5	<p>51. Paragraph 41 of Part 3 of Schedule 1 – the Operational Drainage Management Plan must be submitted to and approved prior to the commencement of any works at the substation site given the importance of that plan in mitigating a serious flood risk and given this plan will have implications for other works (not just work nos 30 and 41). For example work nos 33 (drainage works etc) 34 (permanent operational access road), the connected works, 38 (cable sealing end compounds etc), 39 (pylon realignments and new pylons) and the connected works.</p>	<p>Requirement 41 has been updated in the draft DCO submitted at Deadline 5 to refer to Work Nos. 34 and 38 in order to address this point and to reflect the scope of the Outline Operational Drainage Management Plan (REP4-003).</p> <p>The Applicants do not consider it to be necessary or appropriate for Work Nos. 33 or 39 to be referred to within the requirement given the nature of these works.</p>
6	<p>52. Schedule 16 – given the importance to the local community of the discharge of requirements the applicant should be required to give notice of each application, including to affected parish councils, prior to an application being made for consent, agreement or approval and all information and documentation which is subject to such consent, agreement or approval should be made publicly available from the time such notice is given. Any other information and documentation which is provided to the discharging authority should be made publicly available as soon as it is provided to the discharging authority.</p>	<p>The Applicants do not consider this to be necessary or appropriate. The discharging authority in respect of each requirement is the relevant statutory body to discharge such applications and in fulfilling its role it is at the discretion of the discharging authority to seek input (be that views or particular expertise or information) from whomever it wishes. It is not appropriate for an obligation in terms of notifications to be imposed on the relevant discharging authority unless it is necessary to do so.</p>
7	<p>53. Schedule 16 – given the resources of some discharging authorities (which will also be subject to the demands of many other projects) and the likely complexities of some of the matters subject to discharge, a period of 10 business days within which to request further information is not</p>	<p>Schedule 16 is intended to ensure the timely discharge of requirements and to make provision for an appeals mechanism. The schedule is largely based on that contained within PINS Advice Note 15.</p>

ID	Written Representation	Applicants' Comments
	<p>reasonable given the overall period is 42 days. This period should be extended to at least 20 business days. In terms of appeals the deadlines to which the discharging authorities are subject should be similarly extended. In this context it should be remembered that there could be a significant mismatch in the resources between the undertaker and the relevant discharging authorities and extension of time periods should assist the fairness of the process.</p>	<p>The Applicants consider the provisions (including the time periods) to be necessary and appropriate given that these are NSIPs.</p>