



The Planning Act 2008

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

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 5 – 3 February 2021

Comments of Suffolk County Council Landscape

- 1. Post hearing submissions including written submissions of oral case (if required) and submissions if there are any outstanding matters requiring to be heard**
 - 1.1 SCC's overall comments on the Energy White Paper – which include consideration of how flexibility and technical innovation should be built into the design principles for the substations – are set out in the ISH4 Summary of Oral Case document.
- 2. Comments of Representations in relation to the additional land sought by the Applicant**
 - 2.1 Not applicable.
- 3. The Applicants revised draft Development Consent Order**
 - 3.1 Not applicable.
- 4. Any revised/updated Statements of Common Ground (if any)**
 - 4.1 Not applicable.
- 5. Comments on any additional information/submissions received by Deadline 4**

Applicant's Substations Design Principles Statement ([ExA.AS-28.D4.V1](#))

- 5.1 We strongly recommend a neutral chair for the community engagement event/s.
- 5.2 We are pleased to note that this document includes project substations, National Grid substation and National Grid Sealing End Compounds within scope. On this we assume that the Outline National Grid Substation Design Principles Statement at Deadline One ([ExA.AS-6.D1.V1](#)) is entirely superseded by the the new joint approach of the applicant and National Grid to design review and post consent engagement.
- 5.3 Based on previous experience ([Progress Power](#)) this joint approach is required for both post consent community engagement, and engagement with the Design Council /CABE. Discussion of design and other matters related to post consent engagement for that project can be found in, *Preparing a Flexibility Toolkit Project A continuation project: Consultation and Engagement in the DCO process* NIPA May 2019 - page 21

[https://www.nipa-uk.org/uploads/news/Clifford_and_Morphet_-_NIPA_II_Project_A_extension_project_report_-_Final_\(1\).pdf](https://www.nipa-uk.org/uploads/news/Clifford_and_Morphet_-_NIPA_II_Project_A_extension_project_report_-_Final_(1).pdf)

- 5.4 As discussed in the NIPA report the slower and more cautious approach usually taken by NGET to supply chain engagement for construction projects is likely to slow the development of their final design solution in comparison with that of the Applicant. It would be helpful to understand how they intend to address this issue, or for them to clarify that they are unable to do so?
- 5.5 Notwithstanding the maximum dimensions of the project specified in the DCO, we are disappointed that the applicant and NGET have not made an explicit commitment to use their best endeavours, when working with their supply chains, to further reduce the dimensions of the project. We do not consider that such an undertaking would fetter the Applicant or could be an impediment to the discharge of requirements, but rather is intended to demonstrably inform their discussion with the supply chain and their post consent design review process and engagement.

6. Responses to any further information requested by the Examining Authority for this deadline

ISH4 Heating Action Point 1

- 6.1 The ExA requested the following:

“Response to Energy White Paper

Provide a post-hearing submission referencing recent studies and reports and a submission to ISH6 in respect of an additional design principle requiring regard to be had to technological, policy and regulatory changes that might be in place ahead of the construction of the projects.”

- 6.2 Having regard to the NIS themes of People, Places and Value, SCC notes that the NIS design principles highlight that:

Infrastructure should be designed for people, not for architects or engineers. should be human scale, easy to navigate and instinctive to use, helping to improve the quality of life of everyone who comes into contact with it.

Well-designed infrastructure supports the natural and built environment. It gives places a strong sense of identity, and through that forms part of our national cultural heritage. It makes a positive contribution to local landscapes within and beyond the project boundary.

A good design process adds value by defining issues clearly from the outset and providing overall direction for everyone working on a project. It explores every option for increasing value alongside the creative process.

6.3 Accordingly, SCC's proposed wording for an additional design principle is as follows:

"The detailed design of the project and the procurement processes that support it, will both engage with, respond to, and in so far as practicable, adopt and adapt to, any new opportunities arising from emerging new technologies and changes to legislation and regulations, in order to minimise the harms to the receiving environment and maximise the benefits of the project through good design. Engagement with the opportunities that may be offered from emerging technological, regulatory, and legislative change is a fundamental principle, that will be applied at all times, during the design procurement and development process."