



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

East Anglia TWO Offshore Wind Farm

**Appendix K3 to the Natural England Deadline 6 Submission**

**Natural England's Answers to The Examining Authorities' Written Questions  
(ExQs2)**

For:

The construction and operation of East Anglia TWO Offshore Wind Farm, a 900MW wind farm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

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24th February 2021

## **Natural England's Answers to The Examining Authorities' Written Questions (ExQs2)**

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.



ExQs <b>2</b>			
Question to:		Question:	
<b>2.0</b>	<b>Overarching, general and cross-topic questions</b>		
2.0.1.	Applicants and NGET	<b>1</b>	<b>2</b> <b>Permitted Development Rights</b> Class B, Part 15 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 concerns electricity undertakings and on the face of it appears to allow a wider range of development by statutory undertakers for the generation, transmission, distributions or supply of electricity. Such rights include, subject to restrictions within Class B1, the installation of electric lines, feeder or service pillars, transforming or switching stations, the extension or alteration of buildings on operational land and the erection of buildings for the protection of plant and machinery and any other development carried out in, on, over, or under the operational land of the undertaking.  a) Confirm the boundaries of what would be operational land in this context, should the applications be consented. b) Provide further justification to support your view that permitted development rights should be retained.  The dDCOs Commentaries on Schedule 1 Part 1 refer.



ExQs <b>2</b>				
	Question to:			Question:
2.0.2.	East Suffolk Council and other relevant IPs	<b>1</b>	<b>2</b>	<p><b>Permitted Development Rights</b>            Planning Practice Guidance states that conditions restricting the future use of permitted development rights may not pass the test of reasonableness or necessity.</p> <p>Provide further justification for your views that such rights should be removed – what sort of development could be permitted under such rights and why is it necessary and reasonable to remove such rights?</p> <p>The dDCOs Commentaries on Schedule 1 Part 1 refer.</p>
2.0.3.	East Suffolk Council	<b>1</b>	<b>2</b>	<p><b>East Suffolk Council Documents</b>            If not already done so, please enter into the Examination:</p> <ul style="list-style-type: none"> <li>a) SCC's letter of 10 November 2018 outlining the local authorities' response to SPR's Stage 3 consultation, referenced in [REP4-059] (page 7).</li> <li>b) ESC's Cabinet Report and Resolution of 5th January 2021 (ES/0610), referenced in [REP4-059] (page 4); and</li> <li>c) A copy of the draft agreement made under s111 of the Local Government Act 1972 in respect of mitigation/compensatory funds discussed in the report ES/0610 of ESC's</li> </ul>



ExQs <b>2</b>				
Question to:		Question:		
				Cabinet Report and Resolution of 5th January 2021, referenced on page 4 of [REP4-059].
2.0.4.	East Suffolk Council, Suffolk County Council, Applicants	<b>1</b>	<b>2</b>	<p><b>Proposed s111 Agreement</b></p> <p>In relation to the proposed agreement to be made under s111 of the Local Government Act 1972 in respect of mitigation/compensatory funds, discussed in the report ES/0610 and to which a link is provided on page 4 of [REP4-059], provide a statement committing all parties to the proposed s111 Agreement to signing and submitting the Agreement by Deadline 8 – 25 March 2021. Refer also to the section ‘Obligations and Agreements’ in the dDCOs Commentaries document.</p>
2.0.5.	East Suffolk Council, Suffolk County Council, Applicants, and IPs	<b>1</b>	<b>2</b>	<p><b>Proposed s111 Agreement</b></p> <p>The report ES/0610 of ESC’s Cabinet Report and Resolution of 5th January 2021, referenced on page 4 of [REP4-059] sets out proposals for mitigation/compensatory funds to be procured through an agreement to be made under s111 of the Local Government Act 1972 and summarised in paragraph 7.87: <i>Table 2 – Key mitigation/compensation measures now proposed.</i></p> <p>The ESC Cabinet approved the report’s recommendation which, while maintaining significant concerns in relation to</p> <p><i>(a) the impact of operational noise levels at the onshore substations site which will have an</i></p>



ExQs <b>2</b>	Question to:	Question:
		<p><i>adverse impact on residential amenity and the character of the area until such time that appropriate and suitable mitigation or compensation is secured</i></p> <p>and</p> <p><i>(b) the lack of cumulative assessment of the National Grid substation in its extended form, until such a time as this is considered to be adequately and appropriately addressed;</i></p> <p>and maintaining concerns with regard to the</p> <p><i>design of the onshore substations until such time that the Council's concerns are adequately and appropriately addressed;</i></p> <p>expressed the view that:</p> <p><i>[It] is moving towards a predominantly neutral position in relation to the overall impact of the onshore substations on EA1N and EA2 individually and cumulatively on the village and environs of Friston;</i></p> <p>while acknowledging that:</p> <p><i>the onshore infrastructure is out of character with the village but recognises that the Applicants are seeking to provide embedded</i></p>



ExQs <b>2</b>				
Question to:		Question:		
				<p><i>mitigation as part of their project which coupled with the mitigation and compensation packages proposed will enable the Council working with partners to provide additional improvements in addition to the embedded project mitigation.</i></p> <p>The views of parties are sought on:</p> <ul style="list-style-type: none"> <li>a) The adequacy of the proposed package of mitigation and compensatory measures in light of the advice contained in paragraphs 4.1.3 and 4.1.4 of the Overarching National Policy Statement for Energy (EN-1);</li> <li>b) Additional measures that might be required; and</li> <li>c) Arrangements for distributing compensatory funds.</li> </ul>
2.0.6.	Applicants	<b>1</b>	<b>2</b>	<p><b>EA ONE (N) and EA Two Onshore Substations</b></p> <p>Explain the reason and the significance, if any, of changing the description of the two proposed substations from EA ONE North (the western site) and EA TWO (the eastern site) as, for example, in [APP-094] to the description 'Western Substation' and 'Eastern Substation' in, for example, the East Anglia ONE North Offshore Windfarm Outline Landscape Mitigation Plan [REP4-015], which, confusingly, is a document dedicated only to EA ONE North, but simply refers to the 'Western' and</p>



ExQs <b>2</b>				
Question to:		Question:		
				<p>'Eastern' substations in all the visual material and does not explicitly identify a EA ONE North site.</p> <p>Considering this, please explain:</p> <p>a) If only one project proceeds where will the substation be located and how will this decision be made?</p> <p>b) If only one project proceeds:</p> <ul style="list-style-type: none"> <li>a. What are the implications for the land no longer required?</li> <li>b. What additional mitigation will be provided, if any, and how will its effects be assessed?</li> <li>c. What are the mechanisms for assessing and determining the details of any proposals for land not required in the dDCO?</li> <li>d. What are the implications, if any, for land not required subject to CA proposals?</li> </ul>
2.0.7.	Applicants and IPs	<b>1</b>	<b>2</b>	<p><b>Substations Design Principles Statement (SDPS) [REP4-029]</b></p> <p>a) Does the SDPS provide sufficient information to allow a judgement to be made that the proposals:</p> <ul style="list-style-type: none"> <li>a. produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction</li> </ul>





ExQs <b>2</b>	Question to:	Question:
		<p>and operation, matched by an appearance that demonstrates good aesthetic as far as possible (NPS-EN-1 para. 4.5.5); and</p> <ul style="list-style-type: none"><li>b. are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be (NPS-EN-1 para. 4.5.3)?</li><li>b) If not, what additional information might be provided and how can it be secured?</li><li>c) Will the senior business representative (such as a project director or business director) appointed to be the proposed Design Champion as set out in para. 34 be required to have a recognised design qualification and if not, and in the absence of such a qualification, how will this skill gap be remedied?</li><li>d) Early consideration of how the design principles and policies set out in both the SDPS and Outline Landscape and Ecological Management Strategy (OLEMS) [REP3-030] might translate into design outcomes would be helpful to the ExAs in considering whether the criteria for good design can be met, including</li></ul>



ExQs <b>2</b>	Question to:		Question:	
			<p>an assessment of how the following elements might be addressed:</p> <ul style="list-style-type: none"><li>a. Consideration of the form of the substation complex;</li><li>b. Colour analysis and review of potential façade colours for the external treatment of the substation buildings;</li><li>c. Review of material options for the primary forms of buildings and fencing;</li><li>d. Conclusions relating to the proposed solution for the external appearance of the substation complex in terms of form, colour and materials.</li></ul> <p>e) Why has the 'architectural vocabulary' referred to in paras. 17-19 of the Engagement Strategy that can be applied to the substations throughout all phases of the Projects (and) will provide design proposals for the appropriate solutions for external architectural treatment not been developed for submission to the Examination and included in the Design and Access Statement [APP-580]? Can further consideration of these elements be provided before the close of the Examination and the Design and Access Statement amended accordingly?</p>	



ExQs <b>2</b>				
	Question to:			Question:
2.0.8.	Applicants	<b>1</b>	<b>2</b>	<p><b>Substations Design Principles Statement (SDPS)</b>            East Suffolk Council state that they would like to see genuine engagement of the local community and key stakeholders within the design process and request that an outline of such engagement should be included within the SDPS [REP4-029]. In response you do not consider that such level of detail is required within the document but state that you will consider the engage with ESC on how best to achieve this [REP5-010].</p> <p>a) Why do you consider that such detail is not required within the document?            b) Please update the ExAs on the latest discussions with ESC on this subject.</p>
2.0.9.	Applicants	<b>1</b>	<b>2</b>	<p><b>Substations Design Principles Statement (SDPS)</b>            Respond to the view of East Suffolk Council [REP5-048] that a maximum finished ground level should be included within the SDPS. Justify if your view is that this cannot be provided.</p>
2.0.10.	Applicants, NGET	<b>1</b>	<b>2</b>	<p><b>Substations Design Principles Statement (SDPS)</b>            Suffolk County Council [REP5-056] strongly recommend a neutral chair is appointed for community engagement events and raise further issues relating to National Grid supply chain engagement and best endeavours. East Suffolk</p>



ExQs <b>2</b>			
	Question to:		Question:
			<p>Council raise similar concerns [REP5-048]. Respond to the Councils, specifically on the following:</p> <ul style="list-style-type: none"> <li>a) Can you commit to a neutral chair for community engagement events, and if so can this included in a future revision of the SDPS?</li> <li>b) Respond to the view of the County Council that the approach taken by NGET to supply chain engagement is likely to slow the development of their final design solution. If this point is accepted, suggest solutions or mitigations.</li> <li>c) Can you commit to take all reasonable steps to explore opportunities to reduce the parameters of the substations and to using best endeavours when working with supply chains to further reduce the dimensions of all projects within the SDPS, and is so can this be included in a future revision of the SDPS?</li> <li>d) Confirm when a revised SDPS will be submitted.</li> </ul>
2.0.11.	Applicants	<b>1</b>	<p><b>2</b></p> <p><b>Substations Design Principles Statement (SDPS)</b>            The SASES D5 submission [REP5-097] state that they consider that 3.23ha is not the smallest substation footprint that can be achieved, referring to a 2.1ha benchmark advised by NGESO for BEIS and the 3.22ha footprint for the Hornsea One substation, stated to be 50% more powerful than the proposed EA1N substation.</p>



ExQs <b>2</b>				
Question to:		Question:		
				<p>They also note that some 7ha of land is reserved for the NGET substation.</p> <p>a) Respond to the points above raised by SASES and justify the footprint size of the proposed substations, including the National grid substations and area.</p> <p>b) Can a more efficient design be proposed in terms of footprint?</p> <p>c) Can any further reduction in size or scale be achieved for the proposed sealing end compounds?</p>
2.0.12.	Applicants and IPs	<b>1</b>	<b>2</b>	<p><b>Design evolution</b></p> <p>With reference to NPS-EN-1 para. 4.5.4 and the application documents, outline how the design process was conducted, how the proposed design evolved and how why the preferred design solution was chosen.</p>
2.0.13.	Applicants, ESC, SCC and IPs	<b>1</b>	<b>2</b>	<p><b>Cumulative Effects Assessment at the substations site</b></p> <p>Provide and comment upon a cumulative effects assessment of the combined environmental, economic and community effects on the area north of Friston including the substation sites and National Grid connection apparatus and Friston itself, taking into account embedded and additional mitigation and proposed compensation funds, during construction, operation and</p>



ExQs <b>2</b>				
Question to:		Question:		
				decommissioning, to enable the consideration set out in NPS-EN-1 para. 4.2.6 to be undertaken.
2.0.14.	Applicants, NGET, NGESO and NGV	<b>1</b>	<b>2</b>	<p><b>Cumulative Effects Assessment</b></p> <p>Throughout the Examination various IPs (e.g. SCC [REP4-068]; SASES [REP4-112]) have criticised the adequacy of the Applicants' cumulative impact assessment on the grounds that, while it is acknowledged that a number of planned energy generation and transmission projects (particularly, Nautilus, Eurolink, North Falls and Five Estuaries) have been offered, or are potentially to be offered, a connection to the National Grid at a location near Leiston, likely to be, on the current evidence, at Friston, if one or other of the projects under examination goes ahead, these projects have not been the subject of a cumulative effects assessment.</p> <p>While it has been made clear by the Applicants and NGET that the proposed NG substation at Friston will serve only EA1(N) and EA2; there is evidence that other proposals might follow in due course (e.g. [REP3-112] National Grid Ventures ISHs2 Post Hearing Submission; [REP3-110] National Grid Electrical Systems Operator Ltd ISHs2 Post Hearing Submission; [REP5-115] SEAS Further Evidence of Cumulative Impact). The Applicants' assertion that, other than Sizewell C [APP-395] and [APP-569], these additional projects do not qualify to be considered in a</p>



ExQs <b>2</b>	Question to:	Question:
		<p>cumulative effects assessment because there is insufficient understanding of their scale, scope and timing is understood (see e.g. [REP3-085]). Nevertheless, there is a significant degree of uncertainty and confusion over the possible implications for the area if these other projects are pursued in this location. Effectively ignoring them is not helpful to the Examination.</p> <p>Therefore, in the light of footnote 10 on page 2 of the PINS Advice Note 17 Cumulative effects assessment relevant to nationally significant infrastructure projects that:</p> <p><i>“For the purposes of this advice note, ‘other existing development and/or approved development’ is taken to include existing developments and existing plans and projects that are ‘reasonably foreseeable’”</i></p> <p>And paragraph 3.4.2 that:</p> <p><i>“The assessment should be undertaken to an appropriate level of detail, commensurate with the information available at the time of assessment. Information on some proposals may be limited and such gaps should be acknowledged within the assessment. The assessment will move from a more qualitative to a more quantitative assessment as the availability and/or certainty of information</i></p>



ExQs <b>2</b>				
Question to:		Question:		
				<p><i>increases. Any uncertainty in the assessments should be clearly documented.”</i></p> <p>The Applicants are asked to reconsider their position and, in light of current data availability, work in consultation with NG, NGENSO and NGV to provide a more extensive cumulative effects assessment, focusing particularly on likely environmental, economic and community effects, including projects known to potentially be sited in the area affected by EA1(N) and EA2, to enable the requirements of NPS-EN-1 paras. 4.2.5 and 4.2.6 to be addressed.</p>
<b>2.1.</b>	<b>Aviation</b>			
2.1.1.	Applicants, NATS	<b>1</b>	<b>2</b>	<p><b>Civil Aviation</b></p> <p>a) Provide an update on the draft Statement of Common Ground (SoCG) between the Applicants and NATS [REP1-079] and any progress on the required commercial side agreement.</p> <p>b) Provide an update on any discussions relating to the proposed DCO requirement, as detailed as outstanding in the draft SoCG.</p>
2.1.2.	Applicants, the Civil Aviation Authority	<b>1</b>	<b>2</b>	<p><b>Civil Aviation</b></p> <p>The draft Statement of Common Ground (SoCG) [REP1-070] between the Applicants and the CAA appears to state that all matters are agreed.</p>





ExQs <b>2</b>				
Question to:		Question:		
				a) Confirm is this is the case, and if so when a signed SoCG will be submitted? b) If this is not the case, provide an update on progress and next steps.
2.1.3.	Applicants, the Defence Infrastructure Organisation	<b>1</b>	<b>2</b>	<b>Military Aviation</b> The draft Statement of Common Ground (SoCG) between the Applicants and the Ministry of Defence [REP3-078] appears to state that all matters are agreed.  a) Confirm is this is the case, and if so when a signed SoCG will be submitted. b) If this is not the case, provide an update on progress and next steps.
2.1.4.	Applicants, the Defence Infrastructure Organisation, the Civil Aviation Authority	<b>1</b>	<b>2</b>	<b>Aviation Lighting</b> Requirement 31 of the dDCO contains two parts, of which part (2) is new and differs from that contained within the draft Statement of Common Ground with the CAA [REP-1-070] and the last correspondence from the Defence Infrastructure Organisation [REP3-105].  Part 2 of draft R31 states:  <i>(2) Such lights will be operated at the lowest permissible lighting intensity level.</i>



ExQs <b>2</b>				
Question to:		Question:		
				Confirm or otherwise that you are content with the revised wording.
<b>2.2.</b>	<b>Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))</b>			
2.2.1.	Applicant	<b>1</b>	<b>2</b>	<p><b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: scope</b></p> <p>Please set out the reasoning for not including within [REP3-053] other European sites and qualifying features for which there remains disagreement with NE [REP5-088] and RSPB [REP4-097] that there would be No Adverse Effect on Integrity. Specific reference should be made to guillemot and razorbill of the Flamborough and Filey Coast (FFC) SPA, harbour porpoise of the Southern North Sea (SNS) SAC and Sandlings SPA. For East Anglia TWO, this should also set out the reasoning for excluding potential in-combination effects on red-throated diver of the Outer Thames Estuary (OTE) SPA.</p>
2.2.2.	NE, RSPB and MMO	<b>1</b>	<b>2</b>	<p><b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: scope</b></p> <p>Please confirm that you are satisfied with the European sites and qualifying features that are considered in [REP3-053] (see Table 1.1 of each document). If you are not, indicate which other sites or features you consider should be included and why.</p>
				Natural England will review the Applicant's response to 2.2.1 and our response will be dependent on ongoing collision risk modelling updates. Therefore, our position per our Deadline 3 Appendix 11 [REP3-117] summary remains unchanged.



ExQs <b>2</b>				
Question to:		Question:		
2.2.3.	Applicant	1	2	<p><b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: alternative project designs</b></p> <p>In Table 4.8 of [REP3-053] you contend that larger turbines “are not considered viable for the Project in terms of their commercial availability and sufficient supplier capacity within the construction timeframe”. Please provide evidence to support this statement.</p>
2.2.4.	Applicant	1		<p><b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: alternative project designs</b></p> <p>In Table 4.8 of [REP3-053] which sets out the assessment of alternative project designs, you state that in regard to increasing the distance to the OTE SPA you have considered the application of buffers of greater than 2 km.</p> <p>In updating your derogation case at Deadline 6, please provide further justification and evidence to explain the nature and spatial extent of the “existing and known future constraints” you refer to in Table 4.8, and explain how in practice such constraints would restrict the WTG siting options within the overall Project envelope for EA1N. Where the case builds on evidence in previously submitted documents (such as the ES or [REP3-073]) or oral submissions made at hearings, please set that evidence out in full for the</p>



ExQs <b>2</b>			
Question to:	Question:		
			derogation case and elaborate upon it. Please include a plan or plans illustrating all of the known and future constraints to support the case made, for example in relation to water depths and the location of exclusion areas for other consented cables and infrastructure.
2.2.5.	Applicant	<b>1</b>	<b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: illustrative array layout</b> In updating your derogation case at Deadline 6, please provide the following further justification and evidence:  a) Please provide an indicative plan or plans, at an appropriate scale, to illustrate how 67 wind turbine generators (WTGs) plus supporting infrastructure could fit within the offshore order limits for EA1N whilst also taking into account the minimum spacing requirements between each WTG and the known and future constraints.  b) Please explain (providing illustrative plans where possible) what alternative project designs in terms of turbine size, layout and location within the order limits have been considered in your assessment.  c) Having regard to the comments received by NE at Deadline 5 about providing a 10 km buffer to the boundary of the OTE SPA [REP5-082], please explain why a buffer of greater



ExQs 2				
Question to:		Question:		
				than 2km (and up to 10km) is not achievable, providing evidence of both technical and commercial feasibility considerations. d) What degree of flexibility have you factored in within your offshore order limits reduction to allow for as yet unknown constraints within the site that may only be identified following, for example, further site investigations? What is the justification for this approach?
2.2.6.			2	<b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: illustrative array layout</b> In updating your derogation case at Deadline 6, please provide the following further justification and evidence: a) Please provide an indicative plan or plans, at an appropriate scale, to illustrate how 75 wind turbine generators (WTGs) plus supporting infrastructure could fit within the offshore order limits for EA2 whilst also taking into account the minimum spacing requirements between each WTG and existing and known future constraints within the site. b) Please explain (providing illustrative plans where possible) what alternative project designs in terms of turbine size, layout and location within the order limits have been considered in your assessment.



ExQs <b>2</b>				
	Question to:			Question:
2.2.7.	Applicant	<b>1</b>	<b>2</b>	<p><b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: Increase in minimum turbine draught height</b></p> <p>In Table 4.8 of [REP3-053] you state that:  <i>"increasing air-draught beyond the commitment made to 24m above MHWS would have further implications on technical aspects (tower weight and foundation requirements) and commercial implications."</i></p> <p>In [REP3-073] and at ISH1 you provide an indication of the windfarm sites' water depths and a general view of the layout constraints which could affect the feasibility of a further increased turbine draught height. Please provide evidence to fully justify the technical and commercial reasons why you are unable to commit to a minimum draught height of greater than 24m above MHWS for either project.</p>
2.2.8.	Applicant and NE, RSPB	<b>1</b>		<p><b>The Applicant's Habitats Regulations Derogation Case [REP3-053]: Imperative Reasons of Overriding Public Interest (IROPI)</b></p> <p>a) Please expand on the information in Section 5.2.2 of [REP-053] regarding the significance of the contribution each project is anticipated to make to the claimed public interests, providing a clear reasoning of what the project contribution would be.</p> <p>b) The information in Section 5.2.4 regarding overriding reasons sets out the Applicant's</p>
				Natural England's remit doesn't allow for us to make comment on IROPI cases.



ExQs <b>2</b>				
Question to:		Question:		
				<p>position on the effects upon designated sites. Please comment on whether the overriding reasons case could be affected by amended predictions of the effects of the proposals and a conclusion of AEOI for any of these designated sites.</p>
2.2.9.	Applicant	<b>1</b>	<b>2</b>	<p><b>The Applicant's Compensatory Measures [REP3-054]</b>            Please respond to the comments made by NE in [REP5-082] with regard to the compensatory measures you have proposed on a without prejudice basis in [REP3-054].</p> <p>a) In addition, please clarify how the compensatory measures that are proposed in [REP3-054] for kittiwake, gannet, lesser black-backed gull and red-throated diver (RTD) (the latter being for EA1N only) are to be secured in the dDCO and how the drafting would allow for scenarios in which the Secretary of State concludes there would or would not be a potential AEoI.</p> <p>b) If such compensatory measures were to be undertaken outside of the current order limits for either of the EA1N or EA2 projects then please explain the process by which this would be legally secured, and explain how the long-term monitoring of any compensatory measures would be secured, funded, carried out and assessed.</p>



ExQs <b>2</b>				
Question to:		Question:		
				c) How would alternative measures be provided for, should the proposed compensatory measures for any species prove not to be effective?
2.2.10.	RSPB	<b>1</b>	<b>2</b>	<p><b>The Applicant's Compensatory Measures [REP3-054]: LBBG of the Alde-Ore Estuary SPA</b></p> <p>In [REP4-097], the RSPB states a view that predator management would not be appropriate as a potential compensatory measure for effects on Lesser Black Backed Gull of the Alde-Ore Estuary SPA, seeing this as a site management measure necessary to restore the population to favourable status and not a compensatory one. Who is expected to fund and carry out predator management as a site management measure?</p>
2.2.11.	Applicant	<b>1</b>		<p><b>The Applicant's Compensatory Measures [REP3-054]: RTD of the Outer Thames Estuary SPA</b></p> <p>In its D5 submission [REP5-082], NE has referred to the removal of existing wind turbines from within the OTE SPA as representing the only other compensatory measure for RTD, apart from management of vessel traffic, with a high degree of certainty in reducing anthropogenic influences. Please comment on the feasibility and implications of removing already-installed turbines in order to provide headroom for EA1N.</p>





ExQs <b>2</b>	Question to:		Question:	
2.2.12.	Applicant and NE	<b>1</b>	<b>The Applicant's Offshore Commitments [REP3-073]: Ecological consequences</b> [REP3-073] discusses the reduction in disturbance anticipated from the 2km buffer. What are the ecological consequences of the 2km buffer or larger buffer in terms of the conservation objectives of the Outer Thames SPA?	As set out in our previous advice [REP1-172, REP4-087, REP4-089 and Appendix A17 at Deadline 6] one of the conservation objectives for the SPA is to maintain the distribution of red-throated diver within the SPA. Displacement from their foraging and rafting locations within the SPA would reduce the ability (integrity) of the site to support the species for which the site is designated across its extent. Any buffer between the proposal and the SPA which reduces the extent or the intensity of the displacement will have some ecological benefit compared to no buffer being applied. However, given the SPA is already considered to be in unfavourable condition, the ecological consequences of the project must, as a minimum, be neutral to avoid further hindrance of the conservation objectives for the site. Natural England advises that for both EA1N and EA2 to provide the sufficient degree of certainty of achieving that neutral impact, the buffer between the projects and the SPA must be at least 10km. At any distance less than this the conservation objectives for the site will be hindered and as a result it will not be possible to conclude no AEoI.



ExQs <b>2</b>				
	Question to:			Question:
				Please be advised that disturbance, from e.g. construction and maintenance vessels periodically transiting the SPA, is different to ongoing displacement from a structure that is constantly present like a windfarm. Depending on the vessel transit routes to the site the 2km buffer (per se) may not reduce vessel disturbance to RTD, hence the need for the Best Practice Red-throated Diver protocol. Natural England advises the protocol should mitigate the impacts from vessel disturbance.
2.2.13.	Applicant and NE	<b>1</b>	<b>2</b>	<p><b>Offshore Ornithology Cumulative and In-Combination Collision Risk</b> Please comment on when the mitigation and additional baseline data for Hornsea Project 3 is likely to be made available.</p> <p><b>To Applicants only</b> – Should this data be submitted before the close of the EA1N and EA2 Examinations, then please clarify how long it would take you to update and submit amended collision risk and displacement figures for your cumulative/in-combination assessments?</p>
2.2.14.	RSPB	<b>1</b>	<b>2</b>	<p><b>Project alone AEol for Gannet of the FFC SPA</b> In your D4 response [REP4-097] the RSPB considers that there would be an AEol on Gannet of the FFC SPA from the project alone due to</p>



ExQs 2				
Question to:		Question:		
				collision risk. This differs from the position of NE, who advises in [REP3-117] that there would be no AEoI on Gannet of the FFC SPA as a result of the project alone. Please explain why your position differs from that of NE in this regard.
2.2.15.	Applicants/NE	1	2	<p><b>Benthic ecology: Security for reef buffer</b></p> <p>In NE's D5 submission [REP5-085] it states that it is concerned that the Applicant's request to retain the ability to discuss reef buffer requirements on a case by case basis during the preconstruction period, is not condition-able and therefore the mitigation remains unsecure, even if explained within a listed DCO/dML plan. How would NE/the Applicants suggest this could be secured?</p>
2.2.16.	Applicants			<p><b>Benthic ecology: Reef survey timing and commencement</b></p> <p>Please comment on NE's contention that unless both the UXO clearance and commencement of the OWF installation occurs within 12-18 months of the survey being undertaken a second Annex I reef survey and report will be required prior to construction commencing. How would this be secured?</p>
2.2.17.	Applicants			<p><b>Benthic ecology: Cable installation in mixed sediments</b></p> <p>NE's D5 submission [REP5-085] states that as submitted into examination for Hornsea Project 3,</p>



ExQs <b>2</b>	Question to:	Question:
		<p>Norfolk Vanguard and Norfolk Boreas areas of mixed sediment have proven to be more challenging for cable installation. Case example is cable installation within the Wash and North Norfolk Coast SAC where cables have been sub-optimally buried in areas of mixed sediment and post installation requests have been submitted for cable protection. In order to commit with any certainty that cable protection can be avoided in areas of potential reef Norfolk Boreas utilised available geotechnical investigations to undertake a cable burial assessment which was submitted into examination to provide the necessary evidence to support the proposals. Therefore, NE advises in [REP5-085] that something similar for these projects is submitted into the examination for EA1N and EA2 to demonstrate that cables can be buried to the optimum depth in areas of 'unavoidable' reef or assures that that sub-optimally buried cables would not require external protection i.e. &lt;1m</p> <ul style="list-style-type: none"><li>a) Have the applicants already undertaken such geotechnical investigations?</li><li>b) If not, then are such investigations to be undertaken and submitted before the close of these examinations?</li><li>c) If (b) is the case, then please explain the process by which the extent of cable</li></ul>



ExQs <b>2</b>		Question to:	Question:
			protection that is required is to be assessed and how potential impacts on Sabellaria reef resulting from cable protection can be adequately mitigated.
<b>2.3.</b>	<b>Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations</b>		
	No questions in this round. Relevant matters to be examined in forthcoming hearings.		
<b>2.4.</b>	<b>Construction</b>		
	No questions in this round.		
<b>2.5.</b>	<b>Draft Development Consent Orders (dDCOs)</b>		
	Please see separately published <b>ExAs Commentaries on the dDCOs</b> .		
<b>2.6.</b>	<b>Electricity Connections, Infrastructure and Other Users</b>		
	No questions in this round.		
<b>2.7.</b>	<b>Flood Risk, Water Quality and Resources</b>		
	No questions in this round.		
<b>2.8.</b>	<b>Historic Environment</b>		



ExQs <b>2</b>			
	Question to:	Question:	
2.8.1.	Suffolk County Council	<b>1</b>	<b>2</b> <b>Archaeology – Outline WSI Earthwork Survey</b> In your Deadline 4 response [REP4-067] you note that various sections of the outline WSI should set out the need for completion of the earthwork survey to cover areas identified as inaccessible or only part surveyed. In response, the applicant provided some text [REP5-011] to be added to the WSI at Deadline 6.  Would such text allay your concerns?
2.8.2.	Applicants	<b>1</b>	<b>2</b> <b>High House Farm</b> The Heritage Assessment Addendum [REP4-006] notes that the significance of High House Farm would largely be retained with the predicted loss amounting to an adverse impact of low magnitude, equivalent to less than substantial harm and an effect of minor significance in EIA terms.  At the ExA’s site visits [EV-007d] it was clear that the garden of High House Farm provided clear views across a largely open landscape to the Church of St Mary at Friston. It is fair to say that viewpoints CHVP3 [REP4-008] or VP5 [REP4-036] are not in the same location as the rear garden of High House Farm, being located to the north east and west of this point respectively. The Addendum also states that:  <i>“The presence of the onshore substations and National Grid substation, only 450m to the south-</i>



ExQs <b>2</b>				
Question to:		Question:		
				<p><i>east, would continue to represent a significant change in the character of the landscape in views looking south in the setting of High House Farm”</i></p> <p>a) What would be the minimum distance between the curtilage of High House Farm and the proposed sealing end compounds?</p> <p>b) Would the proposals sever any historical connections between High House Farm and the Church of St Mary to the south?</p> <p>c) Do you consider that the construction of the proposals would have any adverse impact on the significance of the heritage asset?</p>
2.8.3.	Applicants	<b>1</b>	<b>2</b>	<p><b>Friston House</b>  The Heritage Assessment Addendum [REP4-006] notes that Friston House was designed to be appreciated in a private, enclosed woodlands setting with no reference to the wider landscape. Viewpoint CHVP7 [REP4-011] is taken from within these grounds. However, the curtilage and property boundary extends around the outside of these woodlands and includes more open land to the north of the House itself where clear views can be had towards the proposed development sites.</p> <p>Does the setting of the property include any of the wider agricultural landscape around the identified woodlands in your view?</p>



ExQs <b>2</b>			
	Question to:	Question:	
2.8.4.	Applicants	<b>1</b>	<b>2</b> <b>Woodside Farm</b> The Heritage Assessment Addendum [REP4-006] considers that proposed reductions in finished ground levels, heights of structures and extent of the project substations reduces previous assessments of effect on the significance of the heritage asset, with negligible magnitude of impact and minor significance of effect for all three scenarios. The ExA note that the viewpoint relating to this asset, CHVP5 [REP4-010] is set to the west of the listed building on the adjacent public right of way, and that the viewpoint shows the view from the north of the building, between various outbuildings. However, there is no viewpoint that shows the effect on the setting of the listed building from the rear of the heritage asset, either from the projects themselves, or from the proposed mitigation planting.  Would such a viewpoint lead to different potential effects on the setting and the significance of Woodside Farm?
2.8.5.	Applicants	<b>1</b>	<b>2</b> <b>Little Moor Farm</b> The Heritage Assessment Addendum [REP4-006] considers that the revised OLMP and an included woodland belt, as well as reduced finished ground levels and heights of structures would reduce previous assessments of effect on the significance of the heritage asset, with low magnitude for all three operational arrangements, is equivalent to





ExQs <b>2</b>				
Question to:		Question:		
				<p>less than substantial harm and an effect of minor significance in EIA terms.</p> <p>However, CHVP4 [REP4-009] continues to show a large section of the proposed National Grid substation still to be visible, even after 15 years of operations, with the previous largely open view of the Church at Friston completely removed by the proposals.</p> <p>Further justify your view for the reduction in proposed effect on the significance of the heritage asset.</p>
2.8.6.	Applicants	<b>1</b>	<b>2</b>	<p><b>Church of St Mary</b>            At the ExA's site visits [EV-007d] the tranquillity of the Church and its graveyard was noted, including the War Memorial. An inspection inside the Church allowed items detailed in the building's listing to be appreciated and it could be seen that views over the fields to the north could be made not only from various points within the grounds of the Church, but also from the northern windows in the Church's nave.</p> <p>Make any further comments you wish to make concerning any effects of the proposals on the significance of the relevant heritage assets, including on both during operation and construction of the proposals.</p>



ExQs <b>2</b>				
Question to:		Question:		
2.8.7.	Applicants	<b>1</b>	<b>2</b>	<p><b>Sealing End Compounds</b>            Historic England [REP4-079] raise concerns over the location of the two western most sealing end compounds, considered that these appear to “crash into the landscape rather than be placed with care”. In response you state that [REP5-012] the final design and micrositing of the cable sealing ends can only be decided during the detailed design stage.</p> <p>Why is this and can you provide any further information over the proposed sealing end compounds, their location and any potential mitigation?</p>
2.8.8.	Historic England	<b>1</b>	<b>2</b>	<p><b>OLEMS</b></p> <p>a) What effect, if any would do you think the proposed landscaping contained in the revised OLEMS [REP3-030] would have on any harm caused to the significance of the church by the proposals?</p> <p>b) Could increased landscaping have an adverse effect by, for instance, altering the setting of the Church?</p>
2.8.9.	Historic England	<b>1</b>	<b>2</b>	<p><b>Statement of Common Ground – Offshore</b>            The applicants state [REP5-012] that the updated SoCG [REP5-032] for offshore matters is all agreed subject to your review of the updated draft DCO submitted at Deadline 5.</p>



ExQs <b>2</b>				
Question to:		Question:		
				Confirm (or otherwise) that all offshore matters as in the SoCG [REP5-032] are agreed.
<b>2.9.</b>	<b>Land Use</b>			
	No questions in this round.			
<b>2.10.</b>	<b>Landscape and Visual Impact</b>			
2.10.1.	Applicants and IPs	<b>1</b>	<b>2</b>	<b>Outline Landscape and Ecological Management Strategy (OLEMS)</b> Section 3.3 OLEM Design Principles [REP3-030] sets out national and local design policies and Section 3.4 Consultation summarises the detailed comments provided by the OLMP technical working group and LVIA ETG. Explain how the OLEM proposals respond to the national and local policy framework and the comments of the consultation bodies and comment on whether policy objectives are being met.
2.10.2.	Applicants	<b>1</b>	<b>2</b>	<b>Woodland cover - General</b> Do you have, or can you point the ExA to where it can find information on the height of surrounding coverts (Laurel and Grove wood)?



ExQs <b>2</b>				
ExQs	Question to:	Question:		
2.10.3.	Applicants	<b>1</b>	<b>2</b>	<p><b>Access road</b></p> <p>The ExAs note the responses to ExQ1.10.21 [REP1-115] concerning the design of the proposed substation access road and note the reduction in width of road to 7m. While AIL deliveries may be required during operation in the “unlikely event of a replacement transformer being required”, does this mean that such an access road can be sympathetically designed to reduce visual impacts? For instance, given that AIL deliveries will be primarily required during construction, could an alternative material be used for the roads such as Grasscrete (or similar)?</p>
2.10.4.	Applicants	<b>1</b>	<b>2</b>	<p><b>Planting proposals</b></p> <p>Questions at ISH2 concerned provenance and the availability of local stock for landscaping. Given the increased planting provided for in the revised OLEMS [REP3-030] and proposed changes to timing of commencement of works, can you provide an update on this issue?</p>
2.10.5.	Applicants	<b>1</b>	<b>2</b>	<p><b>OLEMS</b></p> <p>Paragraph 89 of the OLEMS [REP3-030] states that:</p> <p><i>“The screening tree belts are not placed hard against the houses, footpaths and villages. On the paths, this creates an experience of walking through farmland that includes</i></p>



ExQs <b>2</b>				
Question to:		Question:		
				<p><i>woodland and the onshore substations, rather than always walking past woodland. At the houses, the planting has avoided enclosure of the historic farms in woodland, which is not how they would have been experienced in the past (this applies particularly to the listed buildings on Friston Moor). The OLMP includes re-establishment of historically mapped tree-lined enclosures close to the farms to achieve screening whilst retaining the farms in a more open farmed landscape.”</i></p> <p>However, it appears that in certain places trees and landscaping are to be placed very close to the boundaries of houses and particularly to the listed buildings on Friston Moor. For instance, revised viewpoint 5 [REP4-036] shows reasonably dense planting very close to the southern boundary of High House Farm. Such planting would seem to effectively enclose the south side of the historic farm in woodland, removing the ‘more open farmed landscape’.</p> <p>Respond to the above.</p>
2.10.6.	Applicants, NGET	<b>1</b>	<b>2</b>	<p><b>Proposed National Grid Substation</b></p> <p>In its response to requests for additional information from ISHs2, National Grid Electricity Transmission (NGET) [REP3-111] explained the issues around the decision to select either Gas or Air Insulation Systems (GIS/AIS) for the proposed</p>



ExQs <b>2</b>				
Question to:		Question:		
				<p>National Grid substation and expressed a preference for AIS. However, a GIS approach requires significantly less land, although building structures for GIS are higher than for AIS.</p> <p>Provide a visual representation of a National Grid GIS substation from Viewpoint 5 at years 1 and 15 of operation to enable the visual effects of this alternative to be assessed and, given the character of the landscape, comment upon the merits and demerits of both GIS and AIS technology from both visual and masterplan perspectives and consider whether, a commitment should be made to one or other technical solution during the Examination, to enable the selected solution to be secured in the dDCO. If this is not possible, explain why and how the resulting uncertainty can be addressed.</p>
2.10.7.	Applicants, IPs	<b>1</b>	<b>2</b>	<p><b>Proposed sealing-end compounds</b>  [REP4-036] EA1N Landscape and Visual Impact Assessment Addendum - Appendix 5 - Viewpoint 5 PRoW near Moor Farm (Figure 29.17 Update) shows at year 15 that the western most sealing end compound, in particular, is clearly visible from the viewpoint despite the additional planting described in paragraphs 45, 100 and 110 of the OLEMS [REP3-030] to provide additional screening.</p> <p>Is the additional planting successful in providing additional screening and, if not, are there further</p>



ExQs <b>2</b>				
Question to:		Question:		
				measures that can be taken to more adequately screen the sealing end compounds?
2.10.8.	Applicants	<b>1</b>	<b>2</b>	<p><b>Landscaping – Future</b> Do you have any views on any implications for the implementation/maintenance of the landscape mitigation currently proposed if further connections to the National Grid are made at Friston?</p>
2.10.9.	Applicants	<b>1</b>	<b>2</b>	<p><b>Landscaping – Growth rates</b> East Suffolk Council [REP4-059] maintain that growth rates for proposed planting remains optimistic, considering that they may be achievable for 15 consistently favourable consecutive growing years, but that is highly unlikely to occur. The Suffolk Preservation Society (SPS) also [REP5-119] remain very concerned over anticipated growth rates, considering that growth rate in the area of the sites is typically not more than 300mm a year. In addition, they raise concerns over long term irrigation. In response to ESC you state that you are committed to prepare a landscape management plan (LMP) based upon</p> <p><i>“an adaptive management scheme (dynamic aftercare) to de-risk the timely delivery of planting, achieve optimum levels of plan growth and provide greater confidence that effective screening from the tree planting areas</i></p>



ExQs <b>2</b>	Question to:	Question:
		<p><i>will be achieved before the end of the adaptive management period” [REP5-010]</i></p> <ul style="list-style-type: none"><li>a) Respond to the view of SPS that growth rates do not typically exceed 300mm a year and that the visualisations suggest a height of 8-9m.</li><li>b) How likely are 15 consistently favourable consecutive growing years, with reference to recent experiences in East Suffolk and climatic conditions?</li><li>c) If 15 consistently favourable consecutive growing years are not likely to be achieved, will the adaptive management scheme allow, for instance, for the removal of underperforming stock and replacement with more mature samples?</li><li>d) Given your answers to a), b) and c), how realistic do you consider the revised photomontages submitted to be?</li><li>e) Will further information on the adaptive management scheme be provided in a future OLEMS, and if so, when will this be provided to the Examinations?</li><li>f) Respond to the views of SPS that artificial irrigation is not guaranteed to support robust growth in the long term and that such methods are an unsustainable approach to horticulture, particularly considering climate change.</li></ul>





ExQs <b>2</b>				
	Question to:	Question:		
2.10.10.	Applicants, East Suffolk Council	<b>1</b>	<b>2</b>	<p><b>Landscape – replacement of failed planting</b> It is noted that the Applicants commit to the replacement of failed planting at the onshore substation locations for a period of ten years. Given that the provided photomontages provide assessments of the effect of landscaping at 15 years, do you consider ten years to be long enough for this provision?</p>
2.10.11.	Applicants	<b>1</b>	<b>2</b>	<p><b>Landscaping and visual impacts – Construction period</b> SASES raise concerns [REP5-096] over the length of the construction period and when individual elements of the proposals would be scheduled. Respond to the points raised by SASES in their representation, specifically:</p> <p>a) Provide any further information concerning the construction of the NG substation. Is there a commitment or confidence that this would be constructed at the same time as the applicant's substation(s)?</p> <p>b) Can commitment be given regarding the programming of the applicants two proposed substations, in a similar way to the commitment to install ducting for both projects at the same time?</p>
2.10.12.	Applicants	<b>1</b>	<b>2</b>	<p><b>Landscaping and visual impacts</b> SASES note that the rearrangement of elements within substations can reduce the visual impact of</p>



ExQs <b>2</b>				
	Question to:			Question:
				<p>development [REP5-096] but note that as this not controlled within the DCO that any improvement as a result of the rearrangement of equipment cannot be relied on.</p> <p>a) Do you agree that the rearrangement of elements within substations can have a beneficial effect on the visual impact of the proposals? If not, why not?</p> <p>b) How could such matters be controlled and secured?</p>
2.10.13.	Applicants	<b>1</b>	<b>2</b>	<p><b>Landscape and visual impacts</b></p> <p>The Landscape and Visual Impact Assessment Addendum [REP4-031] states that for viewpoint 2 (Friston, Church Road), there is a notable reduction in the visibility of both onshore substations and the NG substation and considers that additional planting proposals will offer further mitigation. However, while changes may have reduced the height and scale of the proposals, the visualisations still appear to show a significant change to the views afforded from this presently rural view at all assessed intervals</p> <p>Further justify your views of the reduction of the magnitude of change for construction and operation for this viewpoint.</p>
2.10.14.	Applicants	<b>1</b>	<b>2</b>	<b>OLEMS</b>



ExQs <b>2</b>				
Question to:		Question:		
				<p>The OLEMS [REP3-030] defines certain areas of woodland as 'potential'. It is noted this is defined in section 3.5.5 of the document.</p> <p>Confirm that the potential early planting areas are potential in so far as they may be planted early – in other words confirm that even if not planted early that they will be planted later and form part of the landscaping schemes for the projects.</p>
2.10.15.	Applicants East Suffolk Council Interested Parties	<b>1</b>	<b>2</b>	<p><b>Substations Lighting at Night</b></p> <p>When inspecting the proposed transmission connections site at night, the ExA's observed a dark area, with only limited numbers of artificial light sources visible.</p> <p>At Deadline 5 in response to discussion at ISHs6, East Suffolk Council indicated that it was satisfied that draft Requirements 25(1) and (2) secure the submission, agreement and implementation of an operational artificial light emissions management plan and that draft Requirements 25(3) and (4) secured the submission, agreement and implementation of an operational artificial light emissions management plan in relation to the National Grid substation that are broadly satisfactory in terms of minimising operational light pollution.</p>



ExQs <b>2</b>			
Question to:	Question:		
			a) Is that position supported by other Interested Parties or are any further measures warranted? b) Are any further measures warranted to control construction artificial light emissions at night?
<b>2.11.</b>	<b>Marine and Coastal Physical Processes</b>		
	No questions in this round.		
<b>2.12.</b>	<b>Marine Effects</b>		
	No questions in this round.		
<b>2.13.</b>	<b>Nuisance and other Public Health Effects</b>		
	No questions in this round.		
<b>2.14.</b>	<b>Other Projects and Proposals</b>		
	No questions in this round.		
<b>2.15.</b>	<b>Project Descriptions and Sites Selections</b>		
	No questions in this round.		
<b>2.16.</b>	<b>Seascape, Landscape and Visual Amenity</b>		
	No questions in this round.		



ExQs <b>2</b>				
Question to:		Question:		
<b>2.17.</b>	<b>Socio-economic Effects</b>			
2.17.1.	Applicants	<b>1</b>	<b>2</b>	<p><b>Socio-Economic benefits of the EA1 and EA3 projects</b></p> <p>The ExAs note your written summary of oral case for ISH5 [REP5-029]. The ExAs also note the views of SASES on this issue [REP5-101]. If you wish to do so, expand on your answer at ISH5 of the socio-economic benefits of the above projects, particularly in a local context relative to the direct area of the projects.</p>
2.17.2.	Applicants	<b>1</b>	<b>2</b>	<p><b>Local demographics</b></p> <p>Various IPs raise the issue of the number of people who choose to retire to the local area, raising concerns over the potential loss of such an inward flow of people and the investment that they bring in terms of time and resources to local communities and facilities. Do you have any views on this issue?</p>
2.17.3.	Applicants	<b>1</b>	<b>2</b>	<p><b>Construction</b></p> <p>The Socio Economics and Tourism Clarification note [REP1-036] states that in terms of hotel accommodation that there will only be excess demand in peak season and only where both projects are constructed in parallel and coincides with SZC peak.</p>



ExQs 2				
Question to:		Question:		
				<p>a) Be that as it may, will such an excess demand not create issues in terms of hotel demand, potentially pushing tourists who may spend more in the local economy than construction workers out of the market?</p> <p>b) Figures of an excess demand of 32% up to 59% in peak season appear quite high. Has there been any assessment of how such figures would impact on the local tourist economy?</p> <p>c) SEAS state [REP2-081] that Sizewell C Caravan Park will have 400 spaces, as opposed to 600 as in the Clarification Note and that information from the construction of Hinkley Point has shown that many long-term workers move off site to find accommodation as they prefer their own privacy. Do you have any views on this?</p> <p>d) Have the impacts of the cumulative hotel accommodation studies been assessed in terms of traffic impact? For example, would the commute allowed for take in Great Yarmouth, Lowestoft, Woodbridge and potentially Ipswich? Have any such resultant effects on the A12 at AM and PM peak times been assessed?</p>
2.17.4.	Suffolk Coast DMO	1	2	<p><b>DMO 'The Energy Coast' Report 2019</b> The Applicants [REP5-029] describe the process of arriving at a figure of £24m cost to the tourism industry caused by the projects and Sizewell C</p>



ExQs <b>2</b>			
	Question to:		Question:
			<p>within your report as ‘fundamentally flawed’, due to various reasons including evidence of changes to future behaviour and other methodological reasons.</p> <p>a) Reply to the Applicant’s critique of your Report.</p> <p>b) Provide any comments you wish to make on the Sizewell C tourism perception study referred to by the Applicants.</p>
2.17.5.	Applicants	<b>1</b>	<b>2</b> <b>Social issues</b> Various IPs refer to previous experiences of adverse impact on communities relating to large influxes of ‘temporary’ workers for Sizewell B. Do you have any views on this in relation to the proposals or ways to deal with such potential issues?
2.17.6.	Applicants	<b>1</b>	<b>2</b> <b>Social – Tranquillity</b> One of the key qualities of the Suffolk Coast AONB cited by various IPs is tranquillity. <p>a) Do you agree that the tranquillity of the area is a key factor in the reason many tourists come to this area of Suffolk; walking public rights of way, enjoying the beaches and the ‘big skies’?</p> <p>b) Would the proposals adversely affect this tranquillity, potentially affecting the number of tourists who may wish to visit the area?</p>



ExQs <b>2</b>			
	Question to:		Question:
2.17.7.	Applicants	<b>1</b>	<b>2</b> <b>Cumulative Effects</b> Page 199, ID26 of your Deadline 3 responses to SASES [REP3-072] says that following guidance in Planning Inspectorate Advice Note 17 (AN17) various listed projects were not considered in the Cumulative Impact Assessment (CIA) (in terms of socio-economic impacts) as at the time of the CIA there was inadequate detail upon which to base any meaningful assessment.  Given the passage of time since the CIA, have your views above altered at all – is there now further details available allowing an assessment to be made? In this respect the ExA note that footnote 10 to AN17 states that ‘other existing development and/or approved development’ is taken to include existing developments and existing plans and projects that are ‘reasonably foreseeable’.
2.17.8.	Applicants, East Suffolk Council	<b>1</b>	<b>2</b> <b>Tourism Fund</b> East Suffolk Council make reference [REP5-046] to a ‘Tourism Fund’ which is being discussed with the Applicants which could be utilised to support marketing campaigns to promote the area during construction.  Provide an update to this Fund, including details of amounts, utilisation and how such a fund will be secured if agreed.





ExQs <b>2</b>				
Question to:		Question:		
				If this is to be secured in an Agreement or Obligation or supported by Memoranda of Understanding (MoUs), please refer to it in your relevant responses to the dDCOs Commentaries.
2.17.9.	Applicants	<b>1</b>	<b>2</b>	<p><b>SEAS representations on Roads/Traffic and Tourism.</b></p> <p>Cllr J Trapp on behalf of SEAS [REP5-113] provides a detailed report containing mathematical modelling on the effects of the projects and concluding with effects of job losses of some 440 over the construction period in the local area. Further representations are made by SEAS on the details of ISH5, including a critique of the Biggar Economics Report [REP1-102].</p> <p>Provide any responses you wish to make to the submissions of SEAS.</p>
<b>2.18.</b>	<b>Transportation and Traffic</b>			
2.18.1.	Applicants	<b>1</b>	<b>2</b>	<p><b>A12/A1094 junction at Friday Street</b></p> <p>Following the Applicants' submission of a Traffic and Transport Clarification Note [REP4-027], the ExAs note the Applicants' agreement with Suffolk County Council and East Suffolk Council to introduce a traffic signal scheme, and that a</p>



ExQs <b>2</b>	Question to:	Question:
		<p>commitment will be included in the outline Construction Traffic Management Plan [REP5-028].</p> <p>To aid clarity and understanding of the Traffic and Transport Clarification Note [REP4-027]:</p> <ul style="list-style-type: none"><li>a) please confirm that Appendix A should be Annex A to avoid confusion with Appendix A within it and should be entitled “Technical Appraisal: Three Arm Roundabout Scheme and Average Speed Camera Scheme” rather than “Traffic Signal Appraisal”; and that similarly Appendix B should be Annex B and be entitled “Technical Appraisal: Traffic Signals” rather than “Friday Street Note”;</li><li>b) Given that the Applicants’ preferred option is traffic signals (22 July 2020 report at Appendix B), please explain the Applicants’ assertion in paragraph 4.2.1 of the 28 January 2020 report at Appendix A that “a scheme of average speed cameras ... provides the best (sic) solution ...” and why traffic signals were not considered until later; and</li><li>c) Please confirm that paragraph 1.1.1 of Appendix C to Appendix B (the Stage 1 Road Safety Audit) should also refer to East Anglia ONE North and not just to East Anglia TWO.</li></ul>



ExQs <b>2</b>			
	Question to:		Question:
2.18.2.	Applicants	<b>1</b>	<b>2</b> <p><b>A12/A1094 junction at Friday Street</b>            Following your submission of a Traffic and Transport Clarification Note [REP4-027], the ExAs note your agreement with Suffolk County Council and East Suffolk Council to introduce a traffic signal scheme, and that a commitment will be included in the outline Construction Traffic Management Plan [REP5-028].</p> <p>With reference to the Traffic and Transport Clarification Note [REP4-027], please</p> <ul style="list-style-type: none"> <li>a) confirm that a three-arm roundabout cannot be constructed to standard within the existing highway boundary;</li> <li>b) confirm that construction of the traffic signal option will cause less delay to road users than construction of a three-arm roundabout within the highway boundary;</li> <li>c) explain how MMQ (paragraph 2.6.14 of Appendix B) translates into an actual queue length; and</li> <li>d) explain how delays during operation of the proposed traffic signals will be minimised and queueing traffic managed safely, particularly in respect of A12 southbound traffic.</li> </ul>
2.18.3.	Applicants	<b>1</b>	<b>2</b> <p><b>A12/A1094 junction at Friday Street</b>            Following the Applicants' submission of a Traffic and Transport Clarification Note [REP4-027], the ExAs note the Applicants' agreement with Suffolk</p>



ExQs <b>2</b>			
	Question to:		Question:
			<p>County Council and East Suffolk Council to introduce a traffic signal scheme, and that a commitment will be included in the outline Construction Traffic Management Plan [REP5-028].</p> <p>a) Please give the current position in respect of the Section 278 agreement with Suffolk County Council and East Suffolk Council.</p>
2.18.4.	Applicants		<p><b>A12/A1094 junction at Friday Street</b>            Following the Applicants' submission of a Traffic and Transport Clarification Note [REP4-027], the ExAs note the Applicants' agreement with Suffolk County Council and East Suffolk Council to introduce a traffic signal scheme, and that a commitment will be included in the outline Construction Traffic Management Plan [REP5-028].</p> <p>a) Please give the current position in respect of the details of the proposed scheme;</p> <p>b) Will the Applicants be monitoring traffic speeds and behaviour before commencement of construction and installation of these works, and also continuously after they are complete and in use, so as to be able to evaluate any benefits? and</p> <p>c) Depending on whether and, if so when the Sizewell C project proceeds, what would be the advantages and disadvantages of leaving the signals in place until the Sizewell C project</p>



ExQs <b>2</b>				
	Question to:		Question:	
			replaces the existing junction with a new roundabout as part of the new bypass?	
2.18.5.	Applicants		<p><b>Cumulative impact assessment</b>            Both Suffolk County Council as highway authority and East Suffolk Council as local planning authority have raised concerns [RR-002, RR-007] relating to the scoping out of operations, maintenance and decommissioning activities, and they have reiterated [REP5-055, REP5-062] that they do not have all the information necessary to be able to assess fully the wider impacts of the projects as a whole. For example, in the Applicants' response to our ExQ1.18.20 [REP1-121], the Applicants propose that the works at Marlesford be assessed and approved post-consent.</p> <p>Please explain how the Applicants will ensure that the impacts associated with all relevant activities are all properly considered, assessed and mitigated within the dDCO.</p>	
2.18.6.	Applicants		<p><b>Cumulative impact assessment</b>            In its response [REP5-055] to the Applicants' comments [REP4-025] on Suffolk County Council's response to our ExQ1.18.3 and 1.18.4, Suffolk County Council disagrees with the Applicants' conclusion that a project impact which is lower than the ES threshold should be immediately discounted, given the need to</p>	



ExQs <b>2</b>				
	Question to:		Question:	
			<p>understand whether such an impact would, when considered alongside impacts from other relevant projects, result in cumulative impacts which do require assessment. Examples given are the safety and delay impacts of the proposed works at Marlesford and the increase in HGV traffic at Yoxford, which are all just below the 30% GEART threshold.</p> <p>Please explain how the Applicants have ensured that no impact has been prematurely discounted which might, when taken cumulatively with other relevant impacts, result in an overall impact which requires to be assessed.</p>	
2.18.7.	Applicants		<p><b>Port related traffic</b></p> <p>We note the contents of the Applicants' Abnormal Indivisible Load Access to the Proposed East Anglia TWO and Proposed East Anglia ONE North Offshore Windfarm Substation [APP-529], outline Port Construction Traffic and Management and Travel Plan submitted at Deadline 3 [REP3-047] and Submission of Oral Case at ISH4 [REP5-028].</p> <p>In order for us to understand the total impacts of each project better, both alone and cumulatively, and in particular the route to be used by ALL, please:</p>	



ExQs 2			
Question to:		Question:	
			<ul style="list-style-type: none"><li>a) explain how ports will be used for both onshore and offshore construction;</li><li>b) state whether ports other than Lowestoft and Felixstowe are currently under consideration;</li><li>c) summarise the expected final position regarding the Applicants' choice of preferred base port or ports, explaining the advantages and disadvantages of each port considered;</li><li>d) explain how this assessment has informed the Applicants' assumptions about cumulative traffic generation, both in the study area and further afield, both for onshore and offshore construction and operations;</li><li>e) consider whether the assessment the Applicants have undertaken is sufficiently flexible and robust to provide the worst case scenario in respect of total cumulative onshore traffic and transport impacts, whichever port is chosen; and</li><li>f) explain how and where these impacts have been assessed in the ES.</li></ul>
2.18.8.	Applicants		<p><b>Abnormal Indivisible Loads (AIL)</b> We note the contents of the Applicants' Abnormal Indivisible Load Access to the Proposed East Anglia TWO and Proposed East Anglia ONE North Offshore Windfarm Substation [APP-529], outline Port Construction Traffic and Management and Travel Plan submitted at Deadline 3 [REP3-047] and Submission of Oral Case at ISH4 [REP5-028].</p>



ExQs <b>2</b>		Question to:	Question:
			<p>Please confirm that:</p> <ul style="list-style-type: none"><li>a) the A14 and A12 between Felixstowe and Lowestoft, and the B1122 from Yoxford to Lover's Lane are currently designated as heavy load routes and used by AIL;</li><li>b) who is currently using these routes and how often; and</li><li>c) that these routes will continue to be available for use on these projects, during construction, operation and decommissioning.</li></ul>
2.18.9.	Applicants		<p><b>Abnormal Indivisible Loads (AIL)</b> Beyond the current heavy load route, the Applicants propose that AIL are to access the onshore substations (both for the East Anglia projects and the National Grid substations) via the B1122 through Leiston, the B1069, A1094 and B1121 through Friston.</p> <ul style="list-style-type: none"><li>a) Given that rights over the land required for improvements at the B1069/A1094 junction are not to be acquired permanently, how will AIL movements be managed over the lifetime of the projects?</li><li>b) If this route is to be used for the movement of AIL, and given that Highways England is no longer minded to include additional routes, how would the Applicants propose to support the local highway authority in getting a route to the substations assessed, for example in</li></ul>





ExQs 2				
Question to:		Question:		
			<p>relation to strength and condition of below-road culverts, and designated?</p> <p>c) could such a designation, including any necessary upgrade works, limit or compromise the ability of the local highway authority to undertake improvements to the route, for example traffic calming, pinch points, cycle lanes and footways, to encourage walking and cycling?</p> <p>d) If this route is not to be designated as a heavy load route, how would the route be properly maintained and access for AIL protected for the lifetime of the projects?</p>	
2.18.10.	Applicants		<p><b>Abnormal Indivisible Loads (AIL)</b> The Applicants' response to our ExQ1.18.30 indicates that the Applicants do not propose to use the haul road direct from the B1069 as this would require it to be strengthened.</p> <p>a) Would an assessment of the Applicants' proposed access route also indicate that upgrading and strengthening, for instance in respect of culverts and drains running beneath the road, would also be required?</p> <p>b) Have the benefits of using a strengthened purpose built haul road as a permanent access both to the cable route and the substations for the lifetime of the project by both the Applicants and NG been assessed against the safety, operational and</p>	



ExQs <b>2</b>		Question to:	Question:
			environmental concerns and impacts associated with continuing via the B1069/A1094 and the A1094/B1121 junctions and through Friston up the Saxmundham Road?
2.18.11.	Applicants		<p><b>Local issues and effects – HGV traffic</b></p> <p>The junctions on the A1094 with the B1122 and the B1069 have been assessed by the Applicants as sensitive, and the Applicants have undertaken swept path analysis.</p> <p>In relation to this swept path analysis and diagrams (Appendix 26.21 Swept Path Analysis Sensitive Junctions [APP-547]), some information appears to be missing and in order to aid our understanding of the diagrams we asked about it in our ExQ1.18.50.</p> <p>The Applicants' response to our question 1.18.50 indicates that we were not clear so, to give more detail:</p> <ul style="list-style-type: none"><li>a) The top left-hand diagram on both the drawings in Appendix 26.21 Swept Path Analysis Sensitive Junctions [APP-547] appears not to show the entry vehicle;</li><li>b) Please also add the entry vehicle to the bottom left hand diagram and the exit vehicle to both right hand diagrams on the second drawing; and</li></ul>



ExQs <b>2</b>		Question to:	Question:
			c) please add arrows showing clearly the direction of travel of each vehicle on each diagram.
2.18.12.	Applicants		<p><b>Local issues and effects – HGV traffic</b></p> <p>The junctions on the A1094 with the B1122 and the B1069 have been assessed by the Applicants as sensitive, and the Applicants have undertaken swept path analysis [APP-547].</p> <p>In respect of the A1094/B1122 junction at Aldeburgh, the Applicants’ response to our ExQ1.18.51 states that this swept path analysis <i>“demonstrates that an articulated HGV would oversail into the opposite lane when turning from the A1094 onto the B1122. If this lane was blocked by an oncoming vehicle the HGV would not be able to make the manoeuvre. The HGV or oncoming driver, may therefore have to reverse which may not be possible with following traffic, leading to driver delay. A pilot vehicle would run ahead of the vehicle it is escorting. At the junction of the A1094 and B1122, the pilot vehicle would stop any oncoming traffic to allow the following HGV to pass any oncoming traffic.”</i></p> <p>We have visited this junction and observed its operation [EV-007c, EV-007d], noting in particular the presence of vehicles parked on both the A1094 and B1122 arms close to the roundabout junction. These are not shown on the swept path</p>



ExQs 2				
	Question to:		Question:	
			<p>analysis, which appears to assume no obstructions on the highway.</p> <p>Given the presence of parked vehicles, is it still the Applicants' intention to route HGV and large tipper vehicles through the A1094/B1122 junction? If so:</p> <ul style="list-style-type: none"><li>a) please demonstrate whether and if so how both an HGV and a large tipper can safely negotiate this junction in the presence of parked vehicles, oncoming traffic, and other road users such as cyclists and pedestrians;</li><li>b) Given that the lane is already partially blocked by parked vehicles, please explain in more detail how the presence of a pilot vehicle would safely assist; and</li><li>c) Would the driver of the pilot vehicle have the necessary legal powers to stop traffic?</li></ul>	
2.18.13.	Applicants		<p><b>Local issues and effects – HGV traffic</b></p> <p>The junctions on the A1094 with the B1122 and the B1069 have been assessed by the Applicants as sensitive, and the Applicants have undertaken swept path analysis [APP-547].</p> <p>In respect of the A1094/B1069 junction, we note that the swept path diagrams show that HGV oversail on both manoeuvres and that the tipper oversails making the right turn out of the B1069 onto the A1094.</p>	



ExQs <b>2</b>		Question to:	Question:
			<p>We have visited this junction and observed its operation [EV-007a], noting in particular the poor visibility in both directions on the A1094, particularly for vehicles turning right from the B1069 onto the A1094.</p> <p>In view of this:</p> <ul style="list-style-type: none"><li>a) would a pilot vehicle also be used at the B1069 junction?</li><li>b) If so, would the driver of the pilot vehicle have the necessary legal powers to stop traffic? and</li><li>c) if not, what measures are proposed to safeguard other road users at this junction?</li></ul>
2.18.14.	Applicants		<p><b>Local issues and effects – HGV traffic</b></p> <p>We note that whichever port is chosen as the base port, the A1094 will not be available for AIL and they will be routed via Yoxford.</p> <ul style="list-style-type: none"><li>a) Given the operational conditions on the A1094, particularly in the summer months, and in the interests of a simpler HGV strategy, have the Applicants considered sending all HGV traffic along the A12 via Yoxford rather than using the A1094 through Snape, and bringing forward in conjunction with the Sizewell C project construction of the new access route south of Yoxford?</li></ul>



ExQs <b>2</b>			
	Question to:		Question:
			b) If the A12 route via Yoxford were used for all HGV traffic, would the signal scheme at Friday Street be required?
2.18.15.	Applicants		<p><b>Local issues and effects – B1353 crossing</b>            We note that following consultation the B1353 is no longer to be used for access, but that it will still be necessary to cross it.</p> <p>How have the Applicants addressed any residual concerns about the operation of the proposed signal-controlled haul road crossing?</p>
2.18.16.	Applicants		<p><b>Local issues and effects – access to cable route section 3b)</b>            The Applicants’ response to part a) of our ExQ1.18.39 states that the Applicants wish to retain all three options for access to cable route section 3b).</p> <p>Please outline these options briefly and explain why it is necessary to retain all three options.</p>
2.18.17.	Applicants		<p><b>Local issues and effects – A12 at Marlesford Bridge</b>            It is our understanding that works would not be required here if Lowestoft is selected as the base port for these projects. Until that decision is taken:</p>



ExQs <b>2</b>	Question to:		Question:	
			<p>a) would small AIL (over-heavy loads carried on standard HGV trailers) as well as standard C&amp;U HGV loads still use the A12 at Marlesford?</p> <p>b) has the local highway authority said that it is content that this issue is deferred and agreed at the time that a decision is taken on which base port is to be used; and</p> <p>c) how have the impacts of the proposed works been assessed in the ES? Is there a worst case assessment of impacts?</p>	
2.18.18.	Suffolk County Council		<p><b>Local issues and effects – A12 at Marlesford Bridge</b></p> <p>With reference to ExQ2.18.17 above, is the highway authority content that a worst-case assessment of impact has been provided in relation to this dimension of the proposed developments?</p>	