



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Written Summary of Oral Case

Issue Specific Hearing 11 on 10th March 2021: Flood Risk and Drainage

Applicants: East Anglia TWO Limited and East Anglia ONE North Limited

Document Reference: ExA.SN2.D8.V1

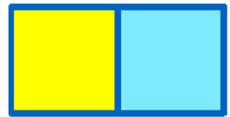
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Applicable to East Anglia ONE North and East Anglia TWO



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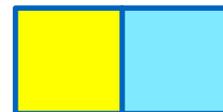
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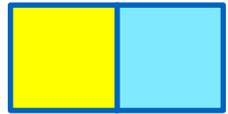
Glossary of Acronyms

CCS	Construction Consolidation Sites
DCO	Development Consent Order
ExA	Examining Authority
FRA	Flood Risk Assessment
ISH	Issue Specific Hearing
LLFA	Lead Local Flood Authorities
LPA	Local Planning Authority
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
NSTS	Non-statutory Technical Standards
OCOCP	Outline Code of Construction Practice
OLEMS	Outline Landscape and Ecological Management Strategy
OODMP	Outline Operational Drainage Management Plan
SoCG	Statement of Common Ground
SPD	Supplementary Planning Documents
SPG	Supplementary Planning Guidance
SuD	Sustainable Drainage Systems



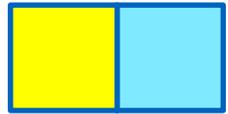
Glossary of Terminology

Applicants	East Anglia ONE North Limited and East Anglia TWO Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO 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 project Development Consent Order.
Projects	The East Anglia ONE North project and the East Anglia TWO project.



1 Introduction

1. This document is applicable to both the East Anglia ONE North and East Anglia TWO Development Consent Order (DCO) applications (the 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 23 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.
2. The Issue Specific Hearing 11 for the Applications were run jointly and took place virtually on 10th March 2021 at 10:00am (Hearings).
3. The Hearings ran through the items listed in the agendas published by the ExA on 2nd March 2021. The Applicants gave substantive oral submissions the Hearings and these submissions are set out within this note.
4. Speaking on behalf of the Applicants were:
 - [REDACTED] partner at Shepherd and Wedderburn LLP;
 - [REDACTED] onshore consents manager at ScottishPower Renewables;
 - [REDACTED] senior flood risk consultant at Royal HaskoningDHV;
 - [REDACTED] chartered engineer, chartered water and environmental manager and associate director at Arup; and
 - [REDACTED] associate engineer at Royal HaskoningDHV.

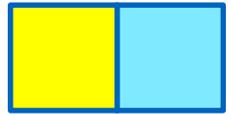


2 Agenda Item 2: Policy Framework in Relation to Flood Risk and Drainage

2.1 National Policy Statement for Energy (EN-1)¹

5. EN-1 was published in 2011 and whilst its policy principles remain valid a number of the references to supporting documentation have been updated in line with updated guidance.
6. Section 5.7 sets out the relevant policy framework for flood risk. Paragraph 5.7.5 sets out the requirements for assessment. Paragraph 5.7.9 provides the key decision making criteria. The approach to mitigation is provided for in 5.7.19 and the specific requirements are set out in 5.7.20 and 5.7.21
7. Section 5.7.5 focuses on the requirements for the Flood Risk Assessment (FRA), and as the FRA for the Projects has been accepted, it satisfies all of the requirements set out in 5.7.5.
8. Section 5.7.9 focuses on determining an application for development consent. As the proposal has fulfilled the below, this section has been satisfied:
 - Been covered by an appropriate FRA;
 - Satisfies the sequential test (see **paragraph 9** for more detail);
 - Is in line with national and local flood risk management strategies;
 - Adopts a SuDS; and
 - Classification of 'essential infrastructure'. This means its continued operation during extreme events is a high priority and as such flood resilient and resistant measures will be adopted, including safe access and escape routes where required, and that any residual risk, such as surface water flood risk can be safely managed over the lifetime of the development.
9. As the onshore substations site is located within a Flood Zone 1 area (which means that there is a low probability of flooding, as classified by the Environment Agency), the site does not require the sequential test to be undertaken. The sequential test simply ensures that developments are planned and built within the lowest area of flood risk possible – Flood Zone 1 – and if that is not possible the sequential test must be undertaken to prove why a higher flood risk area has

¹ Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf



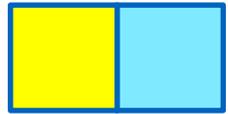
been chosen. As the substations site has the lowest flood risk probability, the test is not required.

10. Section 5.7.10 focuses on construction work which has drainage implications. The National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010, was never implemented. However, there are Non-statutory, National standards published by DEFRA and the proposed development is in accord with these standards. The maintenance and adoption of the SuDs will be undertaken by the Applicants (see the **Outline Operational Drainage Management Plan** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4) for further information on this). Therefore the requirements of 5.7.9 and 5.7.10 have been met.
11. As the development of the Projects will achieve a net reduction in water discharging from the site, the Applicants are providing a net benefit to stakeholders and property from current and future flood risk events.
12. The Projects are fully compliant with the SuDS hierarchy, as detailed in the **Outline Operational Drainage Management Plan** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4).

2.2 National Planning Policy Framework (NPPF)²

13. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and revised on 24 July 2018 and again in February 2019. It sets out the Government's planning policies for England and how these are expected to be applied.
14. Of the 211 paragraphs of the NPPF, only 10 paragraphs cover flood risk (paragraphs 155 to 165).
15. The Local Planning Authority (LPA) is the regulatory body that applies the requirements of the NPPF. Lead Local Flood Authorities (LLFAs) are consultees to the LPA, but LLFAs have no direct statutory powers or duties under the NPPF. Additional powers/duties have been proposed to approve a proposed development under Schedule 3 of the Flood and Water Management Act 2010, but this schedule has not yet been implemented in England. As a consultee to the LPA, the LLFA can make drainage and flood risk recommendations to the LPA.

² Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf



2.3 National Planning Policy Guidance (NPPG)³

16. Paragraph 80 (Reference ID: 7-080-20150323) aims to maximise infiltration on any site as its primary means of drainage. Any water that cannot be discharged by infiltration method will be attenuated on site. Any flow exceeding the storage capacity will be constricted to reduce the resultant peak flow down to greenfield runoff rates before allowing it to discharge to the receiving water body. As such the Applicants are fully compliant with the SuDS hierarchy.
17. Paragraph 82 (Reference ID: 7-082-20150323) aims to explain when a SuDS would be inappropriate. As the LLFA accepts that the proposals for the SuDS are in line with their requirements, subject to measured infiltration rates being obtained at a later stage, the requirements of this paragraph have been satisfied. The technical standards referred to relate to Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010 that were never implemented. However, there are Non-statutory National standards published by DEFRA, and the proposed development is in accord with these standards.
18. Paragraph 83 (Reference ID: 7-083-20150323) aims to conclude if the DEFRA technical standards for SuDS are mandatory. The technical standards referred to relate to Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010 that were never implemented. However, there are Non-statutory National standards published by DEFRA and the proposed development is in accord with these standards.

2.4 Non-Statutory Technical Standards⁴

19. Non-statutory technical standards (NSTS) for sustainable drainage systems 2015 is linked to the NPPF and produced by DEFRA.
20. The NSTS states in its introduction that:

“This document sets out non-statutory technical standards for sustainable drainage systems. They should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance.”
21. There is an alternative version of the NSTS that is published by the Local Authority SuDS Officer Organisation (Lasoo) that is used by some LLFAs⁵. This

³ National Planning Policy Guidance – Flood Risk and Coastal Change (2014), available at <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

⁴ Department for Environment, Food and Rural Affairs (2015), Sustainable Drainage Systems: Non-statutory technical standards for sustainable drainage systems, available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf

⁵ Local Authority SuDS Officer Organisation (2016), Non-Statutory Technical Standards for Sustainable Drainage: Practice Guidance, available at https://www.susdrain.org/files/resources/other-guidance/lasoo_non_statutory_suds_technical_standards_guidance_2016.pdf



contains more detail than the DEFRA NSTS and highlights that the DEFRA NSTS do not cover water quality, amenity, biodiversity or landscape.

2.5 Local Policy

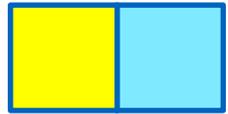
22. LPAs can make local policies that need to be considered when working in their areas.
23. They can also produce Supplementary Planning Documents (SPDs) and or Supplementary Planning Guidance (SPGs) that can implement 'local' requirements that differ from National requirements.
24. In some areas, local SUDS policies are implemented through this mechanism.
25. The East Suffolk Council - Suffolk Coastal Local Plan⁶ (Adopted September 2020) states East Suffolk's policy on:
 - Flood Risk & Holistic Water Management (9.45 to 9.56) resulting in Policy SCLP9.5: Flood Risk;
 - Sustainable Drainage Systems (9.57 to 9.60) resulting in Policy SCLP9.6: Sustainable Drainage Systems; and
 - Holistic Water Management (9.61 to 9.62) resulting in Policy SCLP9.7: Holistic Water Management.

3 Agenda Item 3: Flood Risk and Drainage during Construction

3.1 Assessment and Methodology

26. The assessment of flood risk and drainage during the construction phase is summarised in **Appendix 20.3 - Flood Risk Assessment** (APP-496) and subsequently in the **Outline Code of Construction Practice** (OCoCP) (document updated at Deadline 8, document reference 8.1).
27. In terms of the assessment of flood risk during the construction phase this is carried out in accordance with the same policy and best practice guidance, as for the operational phase i.e. considering the requirements of NPPF and its accompanying NPPG.

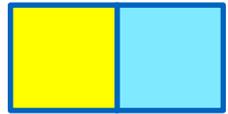
⁶ East Suffolk Council (2020), Suffolk Coastal Local Plan, available at <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>



28. The same data sources, as for the operational phase are reviewed, including industry standard datasets from the Environment Agency (comprising flood risk mapping for a variety of flood risk sources), and information on surface water flooding incidents from Suffolk County Council, in their role as the LLFA.
29. The Friston Surface Water Management Plan has also been reviewed and used as a data source. Although the Friston Surface Water Management Plan shows a surface water flow route across the proposed development site, it does not indicate any flooding issues, reported or otherwise on or around the proposed development site. The Applicants do not expect any flood risk issues to be created by the construction. The Applicants have accepted that earlier ground investigations would have been preferable, however have committed undertaking them post consent.
30. However, when assessing flood risk during the construction phase the assessment differs compared with the operational phase. It focuses on existing risk of flooding both to and from the Projects, timescales for construction and whether once they are operational there is any difference in flood risk.
31. For example, the assessment of flood risk to the onshore cable route focuses on the potential flood risk during construction. Once operational it will be located below ground and therefore will not be at risk of flooding from sources such as fluvial or surface water.
32. At the onshore substation the Flood Risk Assessment assesses the existing and future flood risk at the end of the development lifetime. As the use of the site differs from the construction phase and the operational phase, the approach to setting out the measures for each phase is considered separately.
33. The principles for management of risk during the construction phase, focusing on the need to ensure no change in surface water runoff and flood risk, no increase in sediment supply and no accidental release of contaminant are set out as embedded mitigation measures in ***Environmental Statement Chapter 20*** (APP-068) and within the OCoCP.

3.2 Management of Surface Water and Sediment and the Outline Code of Construction Practice

34. The Applicants have ensured that the Order limits are of sufficient width to accommodate a range of surface water and sediment control measures, as outlined within the onshore development area (this is discussed further in the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (ExA.AS-13.D8.V1).



35. The Applicants have committed to ensuring that the SuDS design and landscape mitigation requirements are both attainable within the Order Limits. The Applicants have provided further detail on this in the **Flood Risk and Surface Water Drainage Note** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1).
36. The OCoCP presents a range of measures which may be drawn upon by the Applicants to manage surface water drainage and sediment during construction within the onshore development area.
37. Mitigation measures within the OCoCP are deliberately broad, and intended to present a range of measures that are available to the Applicants during the detailed design stage, which best reflect the construction methodology selected by the construction contractor.
38. With regards to storm events, storm return periods for design purposes are normally based on the expected design life of the constructed infrastructure, or building, together with the affordability of mitigation measures. In the instance of the Projects, the construction design life is likely to be less than two years, therefore it would be unreasonable to design the protection measures for a one in 100 year event plus a 40% allowance for climate change. Therefore, the design storm return period that will be used will be appropriate and reflect the design life of the construction works. An example of this would be that a one in five year event may be deemed suitable protection for construction that only lasted two years.
39. When considering turbidity, the expected level cannot be estimated at this stage and it will be primarily governed by the soil type which will be concluded during the site investigation works that will be undertaken post consent.
40. Where construction working areas are adjacent to watercourses or cross Flood Zone 2 or 3, the following measures will be implemented:
 - Spoil storage will be laid out with gaps at regular intervals and tightly compacted to minimise impact on flood waters;
 - Any site fencing installed will have regard to possible flood risk and should be designed so as to not impede flows as necessary; and
 - There shall be no storage of spoil directly on watercourse banks. Where possible, spoil will be set back from watercourses by 10m. This will prevent excessive loading on the watercourse banks and minimise the risk of stored material entering the watercourses.



3.2.1 Attenuation, Infiltration or Settlement Ponds

41. A key mitigation solution to be adopted is attenuation, infiltration or settlement ponds along the onshore cable route, construction consolidation sites (CCS) and substation area.
42. **Plate 6.18** of **Chapter 6** of the Environmental Statement (APP-054) shows the **Indicative Cable Trenching Arrangement and Working Area for Typical Onshore Cable Route Width**. In order to accommodate attenuation, infiltration or settlement ponds along the onshore cable route, space will be made available by removing the topsoil stockpiles and replacing with attenuation, infiltration or settlement ponds. This provides approximately 8.4m of the onshore cable route for surface water management. Where required, the edge drain adjacent the perimeter can be increased in width of significant lengths of the onshore cable route, at locations where passing lanes are not provided.
43. This allows approximately one third of the onshore cable route width to be used for surface water management ponds at key locations.

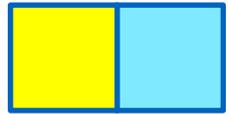
3.2.2 Outline Code of Construction Practice

44. Requirement 22 of the **draft DCO** requires submission and approval of a Code of Construction Practice, in accordance with the OCoCP.
45. A key part of this CoCP, is the production of a detailed construction phase surface water and drainage management plan. The OCoCP presents a range of measures which may be drawn upon by the Applicants to manage surface water drainage and sediment during construction within the onshore development area.
46. These measures can only be finalised on appointment of a construction contractor, allowing their works programme and procedures to feed into the selection of the most appropriate techniques to manage surface water and sediment.
47. The final CoCP will require the approval of the relevant planning authority.

4 Agenda Item 4: Operational Flood Risk and Drainage

4.1 Surface Water Flooding in Friston

48. As noted previously at ISH4, the Applicants are aware of recent surface water flooding in Friston and have reviewed the Surface Water Management Plan commissioned by Suffolk County Council in response to the flooding. The BMT (2020) Surface Water Management Plan Report was reviewed by the Applicants at the time of publication and further information on the underlying modelling has



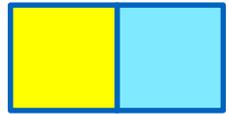
been included in the **OODMP** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4). However, in summary, the review confirmed the Applicants previous conclusion, that the depths and velocities of surface water flow are minimal and therefore are classified to have a 'very low' hazard rating as per the DREFA (2006) Velocity, Depth and Flood Hazard Matrix.

49. The proposed development will not increase the risk of flooding to the proposed development site, and is in fact likely to decrease the risk due to the implementation of a SuDS.
50. At Deadline 5 Suffolk County Council provided a written submission in relation to the flood risk in Friston village including a further summary of flow routes from the onshore substations and National Grid infrastructure (**Comments of Suffolk County Council as Lead Local Flood Authority** (REP5-054)). This did not present additional or new information, it instead provided further clarity on information already available.
51. It has been acknowledged and recorded in the agreement set out in **Statement LA-05.06** of the **Statement of Common Ground with East Suffolk Council and Suffolk County Council** (ExA.SoCG-2.D8.V4), that:

“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.”
52. Therefore, in summary existing flow routes from the east and west remain a flood risk to the village and are not affected by the Projects. Existing conveyance of flow from the north of the site will be maintained; however, through the implementation of the **Outline Operational Drainage Management Plan** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4) the Projects themselves do not increase the flood risk to Friston.
53. Additionally, the **Outline Operational Drainage Management Plan** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4) focuses on the primary option to maximise infiltration, where possible. If there is a need to implement the secondary option this includes limiting runoff to greenfield rates, ensuring that the Projects do not alter the existing flood risk and therefore does not contribute to flooding in Friston.

4.2 Baseline Information / Existing Conditions

54. Information related to the baseline information and existing flood risk to the Projects has been based on a variety of reports and data sources, as set out in the **Appendix 20.3 - Flood Risk Assessment** (APP-496) and subsequently in

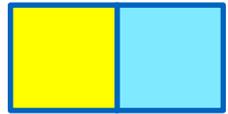


Section 3 of the **Outline Operational Drainage Management Plan** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4).

55. With regard to establishing an understanding of the baseline flood risk conditions, the guidance set out in NPPF and NPPG have been adopted in terms of reviewing all sources of flood risk and their potential interaction with the Projects.
56. Industry standard datasets were obtained and reviewed including from the Environment Agency (comprising flood risk mapping for a variety of flood risk sources), as well as information on surface water flooding incidents from Suffolk County Council, in their role as the LLFA. These are national data sets utilised by the regulatory authorities when assessing a FRA for its adequacy and appropriateness.
57. Paragraph 5.7.5 of EN-1 states that the FRA must be proportionate to the risk, scale, nature and location of the projects. The FRA for the Projects has been accepted and therefore it is deemed to satisfy the preceding requirements.
58. All of the data / document sources identified in the Flood Risk Assessment and the **Outline Operational Drainage Management Plan** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4) have been reviewed to ensure a robust understanding of flood risk to all elements of the Projects from all potential sources of flooding. This review has been undertaken from the landfall along the onshore cable route to the onshore substations.

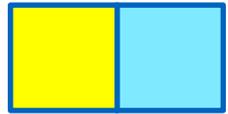
4.3 Outline Operational Drainage Management Plan

59. Following the submission of the **Outline Operational Drainage Management Plan** (REP6-017) submitted at Deadline 6, including details of the calculations undertaken to inform the **Outline Operational Drainage Management Plan** and the Applicants' subsequent meeting with the LPA and the LLFA it has been noted that, it is in the development's interest to maximise the use of the soil's infiltration capacity. This is therefore considered the primary strategy to be used as means to dispose of surface water. The **Outline Operational Drainage Management Plan** has been updated at Deadline 8 (document reference ExA.AS-3.D8.V4) to reflect the LPA and LLFAs position that infiltration should be prioritised.
60. The drainage strategy will benefit, where possible, of the infiltration rates and the SuDS systems will be implemented in such way that the land use is maximised where land is not required for other uses within the site.
61. Should infiltration be possible but prove not to be suitable as the sole mean of disposing of surface water, then a hybrid infiltration and attenuation approach will be considered. This solution will dependent on the soil's available infiltration rates and of a positive discharge rate, no greater than the site's pre-development greenfield rate.



62. Should infiltration not be at all feasible, then an attenuation only solution will apply. The positive discharge rate to be used will not be greater than the site's pre-development greenfield rate. The Q_{BAR} rates currently presented for the greenfield rate have been calculated using the Flood Estimation Handbook (1999) 2013 depth frequency rainfall estimates, which is a conservative approach that was agreed in the **Statement of Common Ground with East Suffolk Council and Suffolk County Council** (ExA.SoCG-2.D8.V4), Please note, these Q_{BAR} rates are currently indicative and will be revised once a site specific hydraulic model has been produced.
63. Independently of which of the above solutions is utilised, the attenuation ponds must incorporate an overflow system to ensure safe conditions are not exceeded under any circumstances.
64. With regards to the three existing depressions at the substations site, there is a commitment that any storage volume lost or displaced will be accounted for within the overall SuDS design. The locations shown in the **Outline Operational Drainage Management Plan** submitted at Deadline 6 (REP6-017) are for indicative purposes only.
65. The Applicants have committed to ensuring that the SuDS design and the landscape mitigation requirements are both attainable within the Order Limits. The Applicants have provided further detail on this in the **Flood Risk and Surface Water Drainage Note** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1).
66. The Reservoir Act (1975) only applies to detention basins which hold a volume of water larger than 25,000m³. The infiltration/attenuation features presented do not have the potential to hold quantities of water over 25,000m³ and therefore do not fall under the Reservoir Act (1975).
67. The Applicants are confident that the SuDS design will be able to discharge to the Friston Watercourse, however this has been clarified in **Appendix 2** of the updated **Outline Operational Drainage Management Plan** which has been submitted at Deadline 8 (document reference ExA.AS-3.D8.V4) as this shows where a connection is planned to be made.
68. The overall adoption and maintenance of the SuDS has been clarified within the **Flood Risk and Surface Water Drainage Note** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1).

4.4 Relationship with Outline Landscape and Ecological Management Strategy (OLEMS)



69. The Applicants have submitted a detailed and comprehensive **Outline Landscape And Ecological Management Strategy** (OLEMS) (document updated at Deadline 8, document reference 8.7) which has taken into account the views of the local community, landowners, the Councils and statutory stakeholders such as Historic England, expressed during the pre-application and Examination stages of the Projects.
70. The OLEMS integrates visual, cultural heritage, surface water, ecological, ornithological and public recreational considerations and must be considered and implemented in this way in order to ensure the overall mitigation needs of the substation site are delivered.
71. The existing surface water flow route which runs through the proposed development area will be re-routed around the Northern perimeter of the site. This has been committed to and further explained in the **Outline Operational Drainage Management Plan** which has been submitted at Deadline 8 (document reference ExA.AS-3.D8.V4).
72. Only at the detailed stage of the Projects, will it be possible to establishing the final footprints, building heights and external equipment heights of the onshore substation and National Grid infrastructure design.
73. This information will inform both the landscaping design and the surface water management system design, both of which must be considered an integrated feature of the substation design.
74. In conclusion, it is imperative to develop the surface water management infrastructure and the landscaping in an integrated manner, ensuring the integrated scheme design reflects the final design of the substations; is appropriate for critical infrastructure, and appropriately balances competing land use. The Applicants view is that is achieved in the current drafting of the **draft DCO** (document updated at Deadline 8, document reference 3.1), whereby the relevant planning authority is responsible for the approval of both the landscaping and the surface water management plans.
75. There will be a coordinated approach to the discharge of all submissions which will include liaison with the local councils and LLFA. This will be undertaken post consent.
76. For clarity, the Applicants would like to confirm that the use of the phrase '*perching of basins*' was incorrect. Within the updated **OLEMS** submitted at Deadline 8 (document reference 8.7) this phrase has been corrected to '*Initial positioning of the infiltration / SuDS basins*'.