

SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments Suffolk County Council's Deadline 8 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited

Document Reference: ExA.AS-6.D9.V1

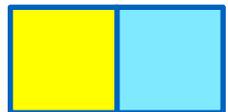
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Applicable to **East Anglia ONE North** and **East Anglia TWO**



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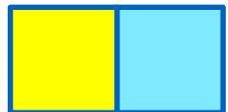
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Glossary of Acronyms

AIL	Abnormal Indivisible Load
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
ExA	Examining Authority
LHA	Local Highways Authority
LLFA	Lead Local Flood Authority
NE	Natural England
NPPF	National Planning Policy Framework
NPS	National Policy Statement
OAMP	Outline Access Management Plan
OCTMP	Outline Construction Traffic Management Plan
OODMP	Outline Operational Drainage Management Plan
OTP	Outline Travel Plan
PD	Procedural Decision
PCC	Parochial Church Council
PRoW	Public Rights of Way
RSA	Road Safety Audit
SCC	Suffolk County Council
SCHAONB	Suffolk Coasts and Heaths Area of Outstanding Natural Beauty
SDNP	South Downs National Park
SoCG	Statement of Common Ground
WQ	Written Question



Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
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.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
HB	A theoretical model unit to compare structures abnormal load bearing capacity, 45HB is the loading benchmark for configuring AIL vehicles



1 Introduction

1. The Applicants have responded to the following documents submitted by Suffolk County Council (SSC) at Deadline 8:
 - SCC Deadline 8 Archaeology comments (REP8-182);
 - SCC Deadline 8 Floods comments (REP8-176);
 - SCC Deadline 8 Highways comments (REP8-174);
 - SCC Deadline 8 Highways Protective Provisions (REP8-175);
 - SCC Deadline 8 Landscape comments (REP8-178);
 - SCC Deadline 8 PRow comments, and (REP8-181);
 - SCC Deadline 8 Planning comments (REP8-179).
2. SCC's post-hearing oral submissions have not been included within this document. Regarding these, the Applicants refer to their submission of Written Summaries of Oral Case (REP8-095 to REP8-100).
3. SCC's submission of SPR EA1 lessons learned document (regarding Floods) (REP8-173) has not been included within this document as ScottishPower Renewables drafted this document for another examination.
4. This document is applicable to both the East Anglia TWO and East Anglia ONE North DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



2 Comments on Suffolk County Council's Deadline 8 Submissions

2.1 Comments of Suffolk County Council as Archaeology Authority

ID	SCC Comment	Applicants' Comments
Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).		
1	SCC comments in relation to the Statement of Common Ground for Archaeology and Cultural Heritage submitted by the Applicants at deadline 7, have been taken on board in the revised version of this document to be submitted at deadline 8. SCC are happy to agree this document and the matters set out within it.	The Applicants note and welcome this.
Comments on any additional information/submissions received by Deadline 7		
2	SCC are happy to agree the revised wording of DCO requirements 19 and 20.	The Applicants note and welcome this.

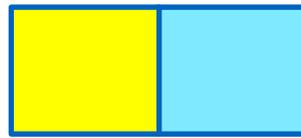


2.2 Comments of Suffolk County Council as Lead Local Flood Authority

ID	SCC Comment	Applicants' Comments
Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).		
1	Statement of Common Ground with East Suffolk Council and Suffolk County Council to be submitted by the Applicant at Deadline 8. Since the Applicants are intending to submit changes to the current version of the Outline Operational Drainage Management Plan and the Outline Code of Construction Practice at Deadline 8 and SCC has not seen the terms of those changes, the Statement of Common Ground still leaves substantial matters of disagreement outstanding. SCC's position on those matters has been rehearsed in its earlier submissions and in the submissions [summary of oral case] above.	The Applicants submitted updated versions of the Outline Operational Drainage Management Plan (OODMP) (REP8-064) and the Outline Code of Construction Practice (OCoCP) (REP8-017) at Deadline 8. It is considered that these will close out LA-05.02, LA-05.04, LA-05.07, LA-05.09, LA-05.11, LA-05.13, LA-05.14, LA-05.18, LA-05.19 and LA-05.20 within the Statement of Common Ground (SoCG).
Comments on any additional information/submissions received by Deadline 7		
EA1N&EA2 Draft Statement of Common Ground with East Suffolk Council and Suffolk County Council – Version 03 (REP7-056)		
2	A final Statement of Common Ground with East Suffolk Council and Suffolk County Council will be submitted at Deadline 8. The Deadline 7 submission, regarding Water Resources and Flood Risk, has not progressed since Deadline 1 (REP1-072).	Noted. Due to the extension of the Examinations (as set out in PD-037), the Applicants will seek to secure agreement with SCC through the SoCG process in respect of remaining matters where possible and submit a further revision of the SoCG at a future Deadline.
EA1N&EA2 Applicants' Comments on Suffolk County Council's Deadline 6 Submissions (REP7-060)		
3	Suffolk County Council as Lead Local Flood Authority have no further comment to make in response to the Applicants' Comments. This should not be viewed as agreement by SCC LLFA that any of	Noted. The Applicants submitted updated versions of the OODMP (REP8-064) and OCoCP (REP8-017) at Deadline 8.



ID	SCC Comment	Applicants' Comments
	the mentioned issues are resolved, merely that our point has been made and we have nothing further to add in response to the Applicants comments at Deadline 7.	Due to the extension of the Examinations (as set out in PD-037), the Applicants will continue to liaise with SCC through the SoCG process to secure the agreement of remaining matters and submit a further revision of the SoCG at a future Deadline.
Responses to any further information requested by the ExAs for this deadline		
4	Issue Specific Hearing 11, Action Point 2 A separate PDF is attached which contains the minutes of EA1 lessons learnt meeting with Scottish Power Renewables, pertaining specifically to Drainage.	Noted.



2.3 Protective Provisions for Suffolk County Council as Highway Authority

5. SCC proposed draft protective provisions in the event that satisfactory wording could not be agreed within the Outline Construction Traffic Management Plan (OCTMP), Outline Access Management Plan (OAMP) and Outline Travel Plan (OTP). The Applicants have continued discussions with SCC and have now agreed wording for insertion into the **OCTMP** (document reference 8.9), **OAMP** (document reference 8.10) an **OTP** (document reference 8.11) which have been submitted at Deadline 9. On the basis of these inclusions SCC have confirmed to the Applicants that protective provisions are no longer required.



2.4 Comments of Suffolk County Council as Local Highways Authority

ID	SCC Comment	Applicants' Comments
Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).		
1	<p>The LHA understands that the Applicant will submit the SoCG between the two parties at deadline 8. This document is well advanced although agreement of LA-031 and LA-033 are conditional on the proposed changes in the LHA deadline 7 response being accepted by the Applicant and documents updated to reflect these.</p>	<p>The changes suggested by SCC in Comments of Suffolk County Council as Local Highways Authority (REP7-076) have been incorporated in the Deadline 8 OCTMP (REP8-021), OAMP (REP8-023) and OTP (REP8-025).</p> <p>As noted above, further changes have been made to the OCTMP (document reference 8.9), OAMP (document reference 8.10) and OTP (document reference 8.11) submitted at Deadline 9 and so the Applicants understand that SCC are now content with these draft plans.</p>
Responses to any further information requested by the ExAs for this deadline		
Issue Specific Hearings 13 (ISHs13): Hearings Action Points		
2	<p>Abnormal Indivisible Load access: Statement report of the Council Structural Team</p> <p>“Suffolk County Council manages all its highways structures on a risk based approach as documented in the ACOP ‘Well-Managed Highway Infrastructure’. We undertake a programme of Inspections, Structural Reviews, Assessments and manage our substandard structures broadly in accordance with CS 470. However, this means that structures may be subject to abnormal load restriction with limited notice following the result of assessment to CS 458 either <i>qualitatively or quantitatively following Structural Reviews, Assessments or as interim measures in accordance with CS 470.</i></p> <p><i>While part of the proposed ‘Designated HGV Delivery Routes’ follows the historic HR100 route in part, this has not been</i></p>	<p>The Applicants have engaged with the SCC structures team throughout the abnormal indivisible load (AIL) route selection process (undertaken during the pre-application stage of the Applications) and have built up a comprehensive understanding of the 55 qualifying bridge assets which are located on the two proposed routes.</p> <p>SCC’s position is quite common throughout local authorities within the UK and the detailed assessment, notifications and controls associated with AIL movements reflect this.</p> <p>An initial risk screening exercise of all the qualify structures has been undertaken utilising the historic inspection information supplied by SCC.</p> <p>The exercise compared the AIL vehicles configurations in the Wynns Report (APP-529) against the advised HB rating for each of the qualifying structures (HB is theoretical model unit to compare structures abnormal load bearing</p>



ID	SCC Comment	Applicants' Comments
	<p><i>maintained by the DfT and along with other structures on our network the condition and hence capacity of structures on this route have gradually deteriorated over time. The Council maintains our network for the movement of vehicles complying to the Road Vehicles (Construction & Use) Regulations 1986 (C&U) Regs and the Road Vehicles (Authorised Weight) Regulations 1998 (AW) Regs. and does not currently have any C&U structural weight restrictions on our 'A' and 'B' class network and we aim to maintain this network to accommodate C&U traffic wherever possible.</i></p> <p><i>While we endeavour to manage abnormal load vehicles which don't meet the C&U and AW Regs but can be used outside these rules under the authority of the Road Vehicles (Authorisation of Special Types) (General) Order 2003 (STGO) we do not currently maintain an abnormal loads network in the County and individual movements are subject to individual notification and may be rejected as new structural information comes to light.</i></p> <p><i>We can only review the movement of Special Order Vehicles having access to a current route survey and current structural reviews of the highways structures crossed by the proposed load. Our Traffic Manager will need to be assured that the movement will not have an adverse effect on normal traffic movements and the Structures Adviser will need to be assured that the load will not exceed the current structural capacity of the structures crossed.</i></p> <p><i>As well as the bridge at Marlesford there are a further 54 qualifying structures identified on the proposed routes. A significant number of these will require further investigation including possible</i></p>	<p>capacity, 45HB is the loading benchmark for configuring AIL vehicles ⁽¹⁾. The key findings were:</p> <ul style="list-style-type: none"> • The majority of structures are rated as 45HB units and those that are not, are small spans and therefore will not be loaded by the entire AIL vehicle (and can be easily mitigated if required). • There are no large spans on either of the AIL routes that place a risk of the configured vehicle exceeding the 45HB loading benchmark (i.e. The configuration of the AIL vehicle would ensure that only a proportion of the load is imparted on the structure). <p>The priority for further review is the structures with poor or unsubstantiated condition indicators (which may compromise the 45HB rating) and the small spans that are not 45HB rated.</p> <p>One of these structures is Marlesford Bridge. Taking a precautionary approach, the Applicants have identified this structure within the DCO Order limits based on the condition data and the access constraints for inspections and remedial work (if required).</p> <p>As set out in response to ExA WQ2.18.9 d) in the Applicants' Responses to Written Question 2 Volume 8 2.18 Transportation and Traffic (REP6-065), the lead in time for the transformer loads is 12 – 24 months. This will afford ample time for structural review, assessment if required and to agree AIL mitigation and traffic management plans with the SCC structures team and Traffic Manager respectively, prior to applying for an AIL load movement.</p>

⁽¹⁾ A unit of HB loading corresponds to four axles and should be taken as equal to 10kN per axle with each axle having four equally loaded wheels.

Applicants' Comments on SSC's Deadline 8 Submissions

15th April 2021



ID	SCC Comment	Applicants' Comments
	<p><i>inspections, structural reviews, assessments and load mitigation works.”</i></p> <p>[maps and HGV routes figures, found here https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010078/EN010078-004609-DL8%20Suffolk%20County%20Council%20-%20Highways.pdf]</p>	

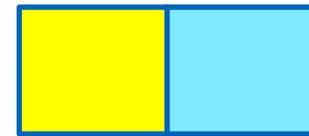


2.5 Comments of the Suffolk County Council Landscape Officer

ID	SCC Comment	Applicants' Comments
Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).		
1	Statement of Common Ground with East Suffolk Council and Suffolk County Council to be submitted by the Applicant at Deadline 8.	Noted. Due to the extension of the Examinations (as set out in PD-037), the Applicants will continue to liaise with SCC through the SoCG process to secure the agreement of remaining matters and submit a further revision of the SoCG at a future Deadline.
Responses to any further information requested by the ExAs for this deadline		
ISH8 AP2 Applicant's Think Piece – Appendix 3 of REP6-049		
2	The Applicants have identified significant adverse impacts on the coastline of the Area of Outstanding Natural Beauty (AONB) and there remains a dispute between the Applicants and Natural England as to the nature and extent of those significant impacts on the character and special qualities of the Suffolk Coast and Heaths AONB. SCC has had early sight of and endorses Natural England's position on this matter that will be submitted at Deadline 8.	The Applicants do not agree with the term 'dispute', rather 'disagreement' is more appropriate. The Applicants' 'think piece' (Appendix 3 of REP6-049) was drafted with the intention of enabling Natural England to set out its position (REP8-169), as requested by the ExA at Issue Specific Hearing 8, and to enable further responses including from the Councils and the Area of Outstanding Natural Beauty Partnership, which have now been received (REP8-144) and are will be responded to at Deadline 9 (NE document reference ExA.AS-4.D9.V1 and ESC document reference ExA.AS-5.D9.V1).
3	SCC considers that, whilst the Think Piece provides some useful background information on other projects and proposals that have impacted, to a greater or lesser degree, on protected landscapes, meaningful comparison is rendered problematic at best by the following issues:	The Applicants have provided comment on Natural England's position on this matter in the Applicants' Comments on Natural England's Deadline 7 Submissions (REP8-049). The Applicants' note that SCC believes the 'think piece' (Appendix 3 of REP6-049) to provide some useful background information on other



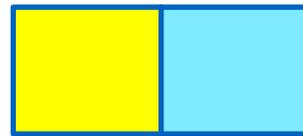
ID	SCC Comment	Applicants' Comments
	<ul style="list-style-type: none"> The differences in character of the respective areas The nature of the receiving environment The significance and sensitivity of the coast as a component of the designation The relationship between the turbines and the viewer The seasonal visibility of the proposed developments and consequent thresholds of sensitivity on the Suffolk coastline see Suffolk Seascape Sensitivity to offshore wind farms October 2020 - White Associates (Appendix B of Suffolk Seascape Sensitivity to offshore Wind Farms http://suffolklandscape.org.uk/wp-content/uploads/2020/10/Suffolk-seascape-sensitivity-to-wind-farms-final-061020.pdf) <p>Therefore, whilst SCC again defers to the views of Natural England on this Think Piece, we would like to draw the Examination's attention to the following issues.</p>	<p>projects and proposals that have impacted protected landscapes, and that it acknowledges some of the limitations of comparison between projects influencing different receiving environments. Nevertheless, the Applicants consider they are useful precedents to provide a range of parameters to which the ExA should give consideration, in line with the suggestion in overarching National Policy Statement for Energy (EN-1) paragraph 5.9.19 that <i>"applicants draw attention... to any examples of existing permitted infrastructure... with a similar magnitude of sensitive receptors"</i>, in order to frame the ExA's consideration of effects on the Suffolk Coast and Heaths Area of Natural Beauty (SCHAONB).</p> <p>The Applicants have provided further comment in relation to each of the following issues raised by SCC.</p>
4	<p>1. In Table 1 the applicant states, under 'Geographical Relationship with Designated Landscape', that both the Rampion array and EA2 project are orientated 'parallel to the coast'. Notwithstanding this apparent common thread, it should be noted that:</p> <p>a) The coastline of the South Downs National Park (SDNP) is only about 18 Km long and is not directly offshore at the key coastal viewpoint of Beachy Head, whilst the SC&H AONB has a coastline of over 70km with EA2 directly offshore for a notable length of its designated coastline. As a result of having a significantly greater length of designated coastline, the coastal nature of the Suffolk designation and its relationship to the sea is</p>	<p>1. The Applicants' would refer the ExA to the Secretary of State's Decision Letter for Navitus Bay, which notes at paragraph 18 that <i>"The ExA decided that the two wind farms (Navitus Bay and Rampion) were not comparable as <u>Rampion's location was set against a section of the coast which, while under a national landscape designation, ran parallel to the wind farm and not, as at Navitus, at the apex of a sector which had as its circumference the Dorset and Isle of Wight coastlines. The Secretary of State agrees with the ExA's conclusion in this matter for both the Application development and the TAMO</u>"</i>.</p> <p>a) While shorter than that of the SCHAONB, Rampion was assessed as having significant effects over the majority of the South Downs National</p>



ID	SCC Comment	Applicants' Comments
	<p>integral to its character and special qualities, in a way that is not the case for the SDNP.</p> <p>b) Furthermore, the majority of the SDNP is in fact separated from the coast by an undesignated and well-developed coastal strip, whereas the Suffolk Coast and Heath AONB has a direct relationship with its coastal strip and adjacent seas, and the limited built environment of the Suffolk Coast and Heaths is incorporated into the designated area, and in fact contributes to the character and special qualities and cultural associations of the designation and the Suffolk Coast in general. These issues are discussed in detail in the local Seascape Typology available at https://suffolklandscape.org.uk/landscape-typology/seascape-typology/ and we draw the Examination's attention to this study, which has been previously provided to the Applicants and was developed, following discussion with the Applicants, regarding the lack of local seascape characterisation material. (s6.1 Cultural Associations in Seascape Character Assessment: Suffolk South Norfolk and North Essex December 2018 https://suffolklandscape.org.uk/wp-content/uploads/2020/08/Part1_5997_Assessment_V1_10_Issue_web.pdf)</p> <p>2. Paragraph 11 states that National Parks have a higher level of protection than Areas of Outstanding Natural Beauty.</p> <ul style="list-style-type: none"> Paragraph 5.9.9 EN-1 states that 'National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty'. At no point does this or any other paragraph 	<p>Park (SDNP) coastline (14.7km of its 18.1km coastline). The Applicants would also highlight, as noted at para 37 of the 'think piece' (Appendix 3 of REP6-049), that there is an extensive area of open south facing downs of the SDNP that extend across the inland backdrop which afford open views across the coastal plain to Rampion and its associative seascape setting. The "<i>stunning, panoramic views to the sea</i>" (SDNP Special Qualities Report) are also integral to some of its special qualities, particularly Special Quality 1 "<i>Diverse, inspirational landscapes and breathtaking views</i>". These views of the sea are appreciated at greater 'depth' inland from the SDNP due the elevation of the downs providing an amphitheatre for sea views. This is unlike the SCHAONB, which is low lying and often backed by forests and heathland and as such effects are confined to the immediate coastal edge.</p> <p>b) The Applicants agree that much of the SDNP is separated from the coast by an undesignated and well-developed coastal strip and that the SCAONB has limited built development in comparison, incorporated within the designated area. As noted above at a), these elevated open downland areas of the SDNP afford open views across the coastal plain to Rampion and its associative seascape setting, providing views of Rampion 'within' its seascape. Effects of this nature will not occur for the East Anglia TWO windfarm site which is viewed from the SCHAONB as 'horizon' development due the low-lying coastline and its longer distance offshore, as described in Chapter 29 of the ES (APP-076) and subsequent written representations submitted during the Examinations. The Applicants note that the Suffolk, South Norfolk and North Essex Seascape Character Assessment was adopted as the baseline for the assessment submitted within Chapter 29 of ES (APP-076).</p>



ID	SCC Comment	Applicants' Comments
	<p>in National Planning Policy state that this status is higher in National Parks than it is in AONBs.</p> <ul style="list-style-type: none"> The level of protection for National Parks and AONBs is the same as both National Planning Policy and primary legislation make clear. The primary statutory purpose of both National Parks and AONBs is the 'conserving and enhancing of natural beauty'. They are equivalent to National Parks in terms of their landscape quality, scenic beauty, and their planning status. 	<p>2. It is accepted by the Applicant that the protection given to Conserving and Enhancing the Natural Beauty is the same for both National Parks and AONBs, as stated by Natural England in their comments, but the applicant's reference in the paragraph related to the wider remit and additional statutory purpose of National Parks. The statutory purposes of National Parks are set out s5 of the National Parks and Access to the Countryside Act 1949 (as amended) and are follows:</p> <p><i>"(1)The provisions of this Part of this Act shall have effect for the purpose—</i></p> <p><i>(a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and</i></p> <p><i>(b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public."</i></p> <p>The purposes not only include Natural Beauty but also Wildlife and Cultural Heritage and "Promoting Opportunities for the Understanding and Enjoyment of the Special Qualities of those areas by the public". Recreation and access to the countryside to enjoy the qualities of parks has therefore been promoted within our National Parks in line with these purposes.</p> <p>The statutory purpose of AONBs is set out in Section 82(1) of the Countryside and Rights of Way Act 2000 England as:</p> <p><i>(1)Where it appears to Natural England that an area which is in England but not in a National Park is of such outstanding natural beauty that it is desirable that the provisions of this Part relating to areas designated under this section should apply to it, Natural England may, for the purpose of conserving and enhancing the natural beauty of the area, by order</i></p>



ID	SCC Comment	Applicants' Comments
		<p><i>designate the area for the purposes of this Part as an area of outstanding natural beauty.</i></p> <p>Therefore, (aside from the policy protections), the statutory duty to have regard to the purposes of an AONB does not include any duty to have regard to any purpose of “<i>promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public</i>”, as would apply in the context of a National Park, and therefore in this sense AONBs do not enjoy the same extent of protection as do National Parks.</p> <p>The NPPF 2019 is also informative with regard to the additional weight to be given to aspects of the protection of National Parks where it states (Paragraph 172):</p> <p><i>172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads</i></p> <p>The NPPF makes it clear that in addition to the great weight to be given to Conserving the Natural Beauty, National Parks also attract great weight in relation to additional matters with respect to the conservation and enhancement of wildlife and cultural heritage, which it does not direct to AONB. The NPPF specifically states that great weight should be given to conserving and enhancing the natural beauty of AONB but not in any other regard.</p> <p>The point is relevant largely because the consented Rampion Offshore Windfarm is an example not simply of consented infrastructure which has a similar level of impact (to which applicants are encouraged to draw attention in NPS EN1 para 5.9.19), but in fact, of consented infrastructure</p>



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		with greater impacts. It is the further functions and purposes of National Parks that also need to be given great weight in any planning balance that was the reason for the statement made in the Applicants' report, as Rampion was tested against these wider purposes.

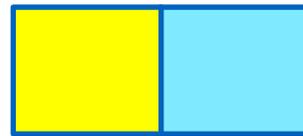


2.6 Comments of Suffolk County Council as County Planning Authority

ID	SCC Comment	Applicants' Comments
Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).		
1	A draft joint Statement of Common Ground between Scottish Power Renewables, East Suffolk Council and Suffolk County Council will be submitted by the applicant at Deadline 8.	Noted. Due to the extension of the Examinations (as set out in PD-037), the Applicants will continue to liaise with SCC through the SoCG process to secure the agreement of remaining matters and submit a further revision of the SoCG at a future Deadline.
Responses to any further information requested by the ExAs for this deadline		
CAH AP4 Highways works at St Peter's Church Theberton		
2	A meeting between the applicants, SCC and a representative of the Parochial Church Council was held on the 24 March 2021 to discuss the proposed highways mitigation works as detailed in Drawing no. TP-PB4842-SK007 Rev D0.1 dated 24.03.2021 drawn by Royal Haskoning DHV.	The OCTMP (REP8-021) submitted at Deadline 8 includes an 'outline concept sketch' for the proposed Theberton Mitigation Scheme. The OCTMP sets out that the detailed design of the works would be agreed with SCC through a Section 278 agreement (Highways Agreement), a draft of which was submitted at Deadline 8 (REP8-021). Paragraph 93 of the OCTMP (REP8-021) commits to engaging with representatives from St. Peter's Church in the progression of the S278 agreement approvals for the Theberton Mitigation Scheme.
3	It was agreed that the applicant would submit the relevant details of the proposed works and that the Parochial Church Council will respond at Deadline 8 with their comments. Parochial Church Council Comments at D8: Whilst the PCC welcome the extension of the footpath west of the B1122, the visibility of the crossing point of the B1122 by Pretty Road is poor especially from East to West and should not be encouraged.	A key component of the S278 approval process would be an independent Road Safety Audit (RSA) undertaken by qualified road safety specialists to ensure that the designs are safe. Any RSA recommendations must be addressed to SCC's satisfaction prior to implementing a scheme. With regards to visibility at the crossing point of the B1122, this would be considered as part of the independent RSA. However, the mitigation measures seek to remove the requirement for pedestrians to walk in the road before



ID	SCC Comment	Applicants' Comments
	<p>The plan is not clear as to how much of the bank will be taken north of Church Road and we understand that detailed plans will follow which will show this.</p> <p>The PCC is concerned the effect this part of the proposed development might have on the stability of the wall and it's affect on the setting of the listed War Memorial.</p>	<p>crossing to the footway on its northern side to continue and promote perpendicular crossing to maximise visibility.</p> <p>With regards proposed Church Road footway works, these would involve the creation of a small area of footway which would largely be constructed within the existing road through a narrowing of the junction. Subject to a detailed topographical survey, there may be a requirement for a small area of the existing earth bank to also be used to construct the footway. Should that be the case, the Applicant will consult with SCC, East Suffolk Council and representatives from St. Peters Church to agree an appropriate solution that will ensure no impact on the structural integrity of the adjacent wall or compromise the War Memorial surroundings.</p>
ISH15 AP6 Substation permitted development rights		
4	SCC defers to ESC on this point.	Noted.



2.7 Comments of Suffolk County Council as PROW Authority

ID	SCC Comment	Applicants' Comments
Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).		
1	The County Council's latest position is set out in the 'notes' section of the SOCG Table 31 and is not repeated here.	Noted. Due to the extension of the Examinations (as set out in PD-037), the Applicants will continue to liaise with SCC through the SoCG process to secure the agreement of remaining matters and submit a further revision of the SoCG at a future Deadline.
Comments on any additional information/submissions received by Deadline 7		
2	SCC are content with the applicants confirmation in REP7-060 that the location of the new public footpath at the substation site will not be placed within the public highway.	The Applicants note and welcome this.