



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on East Suffolk Council's Deadline 9 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited

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Applicable to East Anglia ONE North and East Anglia TWO



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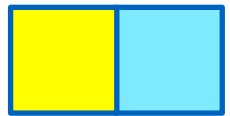
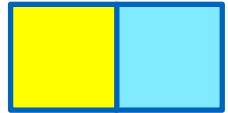


Table of Contents

1	Introduction	1
2	Comments on East Suffolk Council's Deadline 9 Submissions	2
2.1	Response to Additional Information Submitted by the Applicants at Deadline 8 (REP9-040)	2
2.2	Review of Actions Identified in the Local Impact Report (REP9-041)	38



Glossary of Acronyms

AIS	Air-Insulated Switchgear
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
CIA	Cumulative impact assessment
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
ES	Environmental Statement
ESC	East Suffolk Council
EU	European Union
GIS	Gas-Insulated Switchgear
ha	Hectare
HDD	Horizontal Directional Drill
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
LMP	Landscape Management Plan
LOAEL	Lowest Observed Adverse Effect Level
LVIA	Landscape and Visual Impact Assessment
NE	Natural England
NGET	National Grid Electricity Transmission
NGV	National Grid Ventures
NO ₂	Nitrogen dioxide
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
OLEMS	Outline Landscape and Ecological Management Strategy
SCC	Suffolk County Council
SLVIA	Seascape, Landscape and Visual Amenity
SOAEL	Significant Observed Adverse Effect Level
SPA	Special Protected Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System

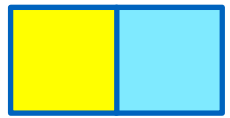


Glossary of Terminology

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.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia ONE North / East Anglia TWO project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia ONE North / East Anglia TWO project Development Consent Order.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore substation	The East Anglia ONE North / East Anglia TWO substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.



Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia ONE North / East Anglia TWO project.
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1 Introduction

1. This document presents the Applicants' comments on East Suffolk Council's (ESC) Deadline 9 submissions as follows:
 - Response to Additional Information Submitted by the Applicants at Deadline 8 (REP9-040); and
 - Review of Actions Identified in the Local Impact Report (REP9-041).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (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 East Suffolk Council's Deadline 9 Submissions

2.1 Response to Additional Information Submitted by the Applicants at Deadline 8 (REP9-040)

ID	ESC Comment	Applicants' Comments
Draft DCO – REP8-003		
1	<p>Article 5 'Benefit of the order'</p> <p>ESC notes the amendments to this article.</p>	No comments.
2	<p>Article 33 'Operational Land for purposes of the 1990 Act'</p> <p>ESC maintains that it is not possible at this stage to determine the extent of operational land at the substations site. There is scope for land both inside and outside the compounds to qualify as operational land. In these circumstances, extensions or new structures/buildings of considerable scale (as defined in the Town and County Planning (General Permitted Development) Order 2015) could be erected without control save where an Environmental Impact Assessment is required. ESC therefore maintains that permitted development rights should be removed specifically in relation to the cable sealing end compounds, EA1N and EA2 substations and National Grid substation. ESC considers that the limited removal of permitted development rights is reasonable and justified. Further more detailed information has been provided by the Council in relation to this matter during the examination but most recently at Deadline 8 within ESC's summary of oral case for Issue Specific Hearing 15 (ISH15) and in response to the action points identified during ISH15 (REP8-149 and REP8-148).</p>	<p>The Applicants agree that the extent of operational land cannot be determined at this point in time. The extent of operational land will be determined by the final extent of the compounds constructed for the carrying on of the undertaking. The Applicants have already responded to the other matters referred to.</p>



ID	ESC Comment	Applicants' Comments
3	<p>Article 37 'Arbitration'</p> <p>ESC maintains the view (REP6-080, REP8-149) that in the interests of clarity Article 37(2) should be revised to explicitly include the relevant planning authority and the highway authority as excluded from the application of Article 37(1), alongside the Secretary of State and Marine Management Organisation. Although the general excluding words in Article 37(1) are noted, there is no reason to expressly exclude the Secretary of State's jurisdiction and not the relevant planning authority's for example. The Applicants' response at paragraphs 12 to 14 of REP8-101 is limited to comment on the Marine Management Organisation's position and does not address the more relevant comparator of the Secretary of State.</p>	<p>The Applicants maintain their position that this is not appropriate. The Applicants would also submit that the Secretary of State is not a more relevant comparator as the Secretary of State is the ultimate decision maker in a DCO context however in any event, the situation with the Secretary of State is different as the consent or approval of the Secretary of State is required under various other provisions of the draft DCO (e.g. Article 5) and so it is necessary to specifically exclude the Secretary of State from the scope of the Arbitration provision. This is not the case with the relevant planning authority.</p> <p>It is not clear why ESC consider this change to be necessary as all consents or approvals required from ESC relate to the requirements and Article 38 and Schedule 16 apply in respect of the discharge of requirements. The change requested by ESC would amount to an "avoidance of doubt" provision which is not appropriate in the context of a DCO.</p>
4	<p>Article 38 'Requirements, appeals etc.' and Schedule 16 'Procedure for discharge of requirements'.</p> <p>ESC welcomes the removal of the deemed consent provision in 1(4) which ESC had previously raised concerns in relation to, most recently at Deadline 8 (REP8-149) and notes the inclusion within 3(1)(b) the ability to appeal against non-determination. ESC is now content with the wording contained within Schedule 16.</p>	<p>The Applicants welcome this position.</p>
5	<p>Article 44 'Offshore ornithology compensation provisions' and Schedule 18 'Offshore ornithology compensation measures'.</p> <p>ESC notes the renaming of Article 44 and Schedule 18 which provides greater clarity.</p>	<p>Noted.</p>
6	<p>Requirement 12 'Detailed design parameters onshore'.</p>	<p>Noted.</p>



ID	ESC Comment	Applicants' Comments
	<p>ESC welcomes the addition of 12(2) which secures the submission of written details in relation to the specification of plant and noise mitigation in respect of Work No.30 in addition to updated modelling. 12(2) identified that this information must be submitted and approved in writing by ESC prior to Work No.30 commencing. ESC also notes the update to 12(5) which ensures any details provided accord with the Substations Design Principles Statement.</p> <p>ESC notes that the National Grid substation (Work No.41) is not included within the wording of 12(2) but reference to Work No.41 has been included within the Design Principles Statement (REP8-082) where further details regarding the Operational Noise Design Report are provided. The wording contained within 12(5), as previously stated, means that details contained within 12(2) must accord with the Design Principles Statement.</p>	
7	<p>ESC supports the further detail provided in 12(9) (a) and (b) which identifies the maximum height for overhead line gantries as 16m above finished ground level but a maximum height of 14.5m is provided for electrical equipment (excluding the overhead gantries).</p>	<p>The Applicants welcome this position.</p>
8	<p>Requirement 13 'Landfall construction method statement and monitoring plan'</p> <p>ESC notes and supports the following amendments to Requirement 13:</p> <ul style="list-style-type: none"> • Amendment to the title to include reference to the monitoring plan. • Requirement to consult the relevant statutory nature conservation body and Marine Management Organisation (where works are seaward of mean high-water springs) in 	<p>The Applicants welcome this position.</p>



ID	ESC Comment	Applicants' Comments
	<p>relation to the construction landfall method statement (13(a)).</p> <ul style="list-style-type: none"> Requirement to consult the relevant statutory nature conservation body regarding 13(3). 	
9	<p>Requirement 15 'Implementation and maintenance of landscaping'</p> <p>ESC welcomes the inclusion of Work No.29 within reference to planting which will be subject of a ten year replacement planting provision alongside Work No.s 19, 24 and 33.</p>	The Applicants welcome this position.
10	<p>Requirement 23 'Construction hours for transmission works'</p> <p>ESC supports the inclusion of additional wording within 23(3) confirming that where works do not fall within paragraphs (2)(a) to 2(e) approval from ESC must be obtained as to whether the works are essential in addition to the timing and duration of the works.</p>	The Applicants welcome this position.
11	<p>Requirement 24 'Construction hours for grid connection works'</p> <p>ESC supports the inclusion of additional wording within 24(3) confirming that where works do not fall within paragraphs (2)(a) to 2(e) approval from ESC must be obtained as to whether the works are essential in addition to the timing and duration of the works.</p>	The Applicants welcome this position.
12	<p>Requirement 27 'Control of noise during operational phase'</p> <p>ESC notes the clarification provided regarding the definition of the term 'standard'. It is now understood that the noise rating levels for the site will be applicable except in the event of an emergency operation.</p> <p>The Applicants have confirmed that 32dB LAeq (1 Woodside Cottages and Woodside Barn Cottages) and 31dB LAeq (Little</p>	The Applicants welcome this position.



ID	ESC Comment	Applicants' Comments
	<p>Moor Farm) are the lowest noise rating levels currently achievable and have provided a commitment within Requirement 12 (REP8-003) and the Substation Design Principles Statement (REP8-082) to provide a pre-commencement Operational Noise Design Report. A summary of the content of this report is provided within the Design Principles Statement in addition to a commitment that:</p> <p><i>'The Applicants will seek to minimise the operational noise rating level below the limits set out in Requirement 27 of the draft DCO (REP7-006) and avoid any perceptible tones and other acoustic features at any residential receptor that would attract a correction in accordance with BS4142:2014+A1:2019, insofar as these mitigation measures do not add unreasonable costs or delays to the Projects or otherwise result in adverse impacts on other aspects of the environment (e.g. landscape and visual impacts).'</i></p> <p>On this basis, ESC accepts the combined operational noise rating levels provided in Requirement 27. Further details in relation to the Council's position were provided at Deadline 8 (REP8-145 and REP8-146).</p>	
13	<p>Requirement 37</p> <p>ESC had previously stated (REP6-080) in response to the Examining Authority's commentary on the draft Development Consent Orders (DCOs) that the inclusion of a commitment within Requirement 37 to notify the 'relevant planning authority' of the date when construction of Work No.6 and 8 has been completed should be provided. Although this has not been included within the requirement, the Applicants have provided this commitment within</p>	<p>The Applicants welcome this position.</p>



ID	ESC Comment	Applicants' Comments
	<p>the Outline Landfall Construction Method Statement (REP8-053) which is accepted.</p>	
14	<p>Requirement 41 'Operational drainage management plan'</p> <p>ESC supports the current drafting of Requirement 41 where the 'relevant planning authority' is identified as the discharging body in consultation with SCC and the Environment Agency (EA). It should be noted that ESC is also the discharging authority in relation to Requirement 22 (Code of Construction Practice), which includes the Surface Water Drainage and Management Plan for the construction works. As far as ESC is aware, there has been no objection to the wording of Requirement 22 raised by other statutory bodies.</p> <p>Separate to this, ESC has agreed that SCC would be the discharging authority in relation to specific highways and archaeological requirements within the draft DCOs. Those requirements primarily relate to works occurring during the construction phase or where they do relate to the operational phase, the works are primarily confined to matters where there is limited interaction with other environmental matters such as landscaping etc. It has therefore been accepted that in these specific cases SCC is the discharging authority for those requirements. That is not the case for Requirement 41.</p> <p>As ESC has previously set out, most recently at Deadline 8 (REP8-152), the operational drainage arrangements are a fundamental component of the overall design of the substations site. Local and national policy recognises the need to integrate sustainable drainage systems (SUDs) into site design so that they are multifunctional. ESC is best placed to facilitate this holistic approach to site design, which is the approach advocated by the Applicants.</p>	<p>ESC's position is noted and the Applicants have no further comments.</p>



ID	ESC Comment	Applicants' Comments
	<p>In consultation with the identified consultees, ESC can manage and provide a response that addresses the operational drainage requirements within the wider landscaping proposals for the site – which will be in place for at least 25 years.</p> <p>In addition to Requirement 41, ESC is the discharging authority in relation to Requirement 12 (Detailed design parameters onshore), Requirement 14 (Provision of landscaping), Requirement 17 (Fencing and means of enclosure), Requirement 21 (Ecological Management Plan), Requirement 25 (Control of artificial light emissions during operational phase) and Requirement 27 (Control of noise during operational phase) details of which will all affect the overall site design. It is important that these matters, including Requirement 41 are not disaggregated which could serve to undermine the current holistic approach to site design and lead to difficulties and inconsistencies. Having one discharging authority for these matters which are all of vital importance to the overall site design is of paramount importance for ESC as the discharging and responsible enforcement authority.</p> <p>Officers at ESC have the knowledge, experience and expertise to be able to engage with multiple consultees as will be necessary in relation to multi-faceted requirements allocated to ESC for discharging within the DCOs.</p> <p>ESC recognises the importance of the contribution of SCC as the Lead Local Flood Authority and supports their inclusion as a consultee alongside the EA. The Operational Drainage Management Plan will also include details of foul drainage which falls within the remit of the EA and in the same way ESC would engage with SCC, the Council will also engage with the EA to</p>	



ID	ESC Comment	Applicants' Comments
	<p>ensure that any details submitted are acceptable prior to discharging the requirement.</p> <p>Part 8 (Enforcement) of the 2008 Planning Act clearly identifies that ESC as the district planning authority would be the authority responsible for enforcing a breach of the DCOs. It is therefore appropriate, given the complex nature of the substations site and applicable overlapping requirements, that ESC remains the discharging authority for the relevant matters (subject to the limited exceptions for highways and archaeology referred to above) including Requirement 41.</p> <p>Finally, it is also evident in the writing of the Planning Inspectorate's Advice Note 15 'Drafting Development Consent Orders' that it is assumed the discharging authority will be the relevant planning authority (Section 19.1 and 19.3). This is not to say that an alternative discharging authority could not be provided, it is however considered there would need to be a significant reason to deviate from this. As has been outlined above, it is considered that there are fully justifiable and appropriate reasons why ESC should remain the discharging authority.</p>	
<p>Outline Landscape and Ecological Management Strategy (OLEMS) – REP8-019</p>		
15	<p>Section 3.6 (Woodland East and West of Aldeburgh Road), paragraph 156.</p> <p>The Applicants' commitment that any trees and shrubs reinstated at the Hundred River will be subject to a ten year a management period and adaptive management measures is noted. The commitment to revised access arrangements to Work Nos. 19 and</p>	<p>Noted. The Applicants consider this matter closed and have no further comment.</p>



ID	ESC Comment	Applicants' Comments
	20 from Aldeburgh Road therefore slightly reducing woodland loss is also noted and welcomed.	
16	Section 4.2 (Outline Landscape Management Arrangements) ESC notes the commitments made by the Applicants in paragraph 160 to prepare a Landscape Management Plan (LMP) based on an adaptive planting management scheme for trees and shrubs planted within Work No.s 19, 24, 29 and 33. The Council welcomes the inclusion of Work No.29 and notes the comments contained within footnote 3.	Noted. The Applicants consider this matter closed and have no further comment.
17	ESC supports the inclusion of the additional wording in paragraph 169 which provides further clarity that measures in relation to the longer-term management of the substations site will be agreed with ESC.	Noted. The Applicants consider this matter closed and have no further comment.
18	Section 5.2.3.2 (During Construction), paragraph 196. Confirmation that the triangle of woodland on the southern boundary of Work No. 9 will be retained is welcomed.	Noted. The Applicants consider this matter closed and have no further comment.
19	Section 6.9 (Reptiles), paragraph 298. The need for pre-commencement reptile surveys should be kept under review. If there are significant changes in the amount of suitable reptile habitat on the cable route prior to the commencement of works surveys may be required ahead of mitigation being implemented.	If, during the pre-construction walkover, significant change in the extent and area of reptile habitat is identified from that presented within the Environmental Statement (ES), the Applicants will consult with the relevant planning authority during the preparation of the final Ecological Management Plan (EMP) on the need for additional measures beyond the Precautionary Method of Working (as specified within the OLEMS (document reference 8.7)). However, based upon the results of the surveys undertaken to date, it is not anticipated that there will be a need to undertake further reptile surveys.



ID	ESC Comment	Applicants' Comments
		If required, suitable and appropriate measures for mitigating potential construction phase impacts upon reptiles would be identified and secured within the EMP.
20	Chapter 8 (Overview of Ecological Surveys), paragraph 398. The commitment to a pre-construction walkover survey of the whole onshore development area to inform further specific pre-construction surveys is welcomed.	Noted. The Applicants consider this matter closed and have no further comment.
Outline Landfall Construction Method Statement (OLCMS) – REP8-053		
21	Section 1.4 (Consultation) ESC notes the requirement to consult the Marine Management Organisation and Natural England which is identified within Requirement 13 and replicated in this section of the document. ESC also welcomes the commitment in paragraph 14 to notify ESC of the date when construction of Work No.s 6 and 8 has been completed.	Noted. The Applicants consider this matter closed and have no further comment.
22	Section 4.2.2 (Construction Noise Control), paragraphs 29 and 31. The additional construction mitigation measures set out in paragraphs 29 and 31 are welcomed. The siting of plant should also consider the potential to minimise air quality impacts on the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) arising from NOx emissions. The minimisation, assessment and mitigation of air quality impacts should be made more explicit. Further comments in relation to ESC's concerns regarding the impacts of Non Road Mobile Machinery (NRMM) at the landfall on ecological receptors is	Noted. The Applicants confirm that a consideration of both noise sensitive receptors and air quality impacts will inform the positioning and orientation of plant and equipment required for landfall construction.



ID	ESC Comment	Applicants' Comments
	provided in relation to the Outline Code of Construction Practice (OCoCP).	
23	Section 6.2.3 (Subsurface Breakout on Land) ESC notes the additional measures set out in paragraph 74 due to the proximity of the private water supply at Ness House.	Noted.
Outline Watercourse Crossing Method Statement (OWCMS) – REP8-084		
24	Section 3.5 (Access), paragraph 47. ESC welcomes the commitment to revised access arrangements from Aldeburgh Road in the form of the use of temporary traffic signals where required, which allows a slight reduction in the vegetation/woodland clearance required. This is obviously subject to this solution being safe and acceptable to SCC as the local highway authority.	Noted. The Applicants note that the revised access arrangements from Aldeburgh Road have been accepted by Suffolk County Council (SCC) as per paragraph 4.6 of its Deadline 9 submission (REP9-046). The Applicants therefore consider this matter closed and have no further comment.
25	Section 4.8 (Onshore Cable Route Width), paragraph 64 ESC welcomes the slight revision to the wording within this paragraph which clarifies that the Applicants will seek to minimise the vegetation/woodland clearance in this area as a whole.	Noted. The Applicants consider this matter closed and have no further comment.
26	Section 4.19 (Species Specific Mitigation), paragraph 94. The inclusion of the commitment to pre-construction bat surveys is welcomed.	Noted. The Applicants consider this matter closed and have no further comment.
Ecological Enhancement Clarification Note Addendum – REP8-041		
27	Section 2.1 (Onshore Cable Route), paragraph 9.	The Applicants advise that paragraph 9 has been included in the report in error and should be disregarded. However, the same information is presented in its



ID	ESC Comment	Applicants' Comments
	<p>It is considered that greater clarity is required in relation to this paragraph. Whilst the approach to the assessment of assuming no enhancement of hedgerows (and therefore indicating greater biodiversity gain than may be the case) is understood, nevertheless the aspiration should be that the projects leave hedgerows along the cable route in better condition (in the long term) than they currently are. This should be reflected in the hedgerow planting proposals for the projects.</p>	<p>proper form in paragraph 10. The Applicants confirm that the Projects will seek to enhance hedgerows affected by construction of the onshore cable route. These enhancements have not been included within the calculations at this stage as full details (e.g. species list) are not available. REP8-041 therefore presents a very conservative picture of what the Projects could eventually achieve.</p>
28	<p>Whole document.</p> <p>The clarification detailed regarding the potential for habitat based ecological enhancements provided by the projects is welcomed. Whilst delivery of genuine ecological enhancement will be reliant on good implementation and long-term management of the created habitats, it is acknowledged that the landscape planting at the substations site has the potential to also deliver some ecological enhancement when compared with the baseline condition. However, the degree to which these habitats will be used by more disturbance sensitive species (such as bats) is unknown and will depend on the final operational noise and light levels.</p>	<p>Noted. The Applicants consider they have demonstrated that reasonable efforts have been and will be made to design and establish landscape planting and other habitats that will provide suitable habitat for wildlife.</p>
<p>Extension of National Grid Substation Appraisal – REP8-074</p>		
29	<p>Section 1.1 Purpose</p> <p>ESC notes the Applicants have stated in paragraph 17 that options for the landfall location, underground onshore cable route and converter station site for the Nautilus project are currently being assessed by National Grid Ventures (NGV) for feasibility and there is no further detailed information on the project available. ESC also notes that the Applicants have stated in paragraph 18 that the</p>	<p>The Applicants' position on this matter remains as set out in section 1.1 of the Extension of National Grid Substation Appraisal (REP8-074) (and repeated in a number of other submissions to the Examinations). The Applicants agree with ESC that the information within REP8-074 does not comprise a cumulative impact assessment (CIA). This is for the reasons stated in section 1.1, namely that there is insufficient information on Nautilus and Eurolink to undertake a CIA.</p>



ID	ESC Comment	Applicants' Comments
	<p>Eurolink project is in very early stages of development highlighting that information is provided regarding the capacity of the project but with no further information known. ESC considers that a degree of information could be assumed based on NGVs previously constructed interconnector projects, but it is accepted that the preferred locations for the siting of the landfall, cable routes and converter stations have not been identified by the developer.</p> <p>Having said the above, ESC agrees with the Applicants that there is a level of certainty in relation to the location of the extensions required to the National Grid substation (which is the subject of these current applications), to accommodate the future connections required for the Nautilus and Eurolink projects (paragraph 19). ESC notes the statement that the likely infrastructure within these extensions would mirror that of the existing design of the National Grid substation. The connection of the projects at Friston will however result in the need to site the project converter stations within approximately 5km of the National Grid substation.</p> <p>ESC accepts that the Applicants have only included the Nautilus and Eurolink projects within this appraisal given the submissions provided by North Falls (REP7-066) and Five Estuaries (AS-100) and the limited information available in relation to the SCD1 subsea link.</p> <p>The Council however had requested that a cumulative impact assessment be undertaken to ensure that the full implications of the in-combination effects of the projects together would be known. It is accepted that the appraisal submitted provides some useful information in relation to the potential in-combination effects, but the assessment is not a cumulative impact assessment. This statement is made in respect of the scope of the appraisal as detailed below</p>	<p>The Applicants agree that certain details for Nautilus and Eurolink (e.g. basic construction methods and infrastructure to be installed) are likely to be similar to National Grid Ventures' (NGV) previously constructed interconnector projects. However, CIA requires an understanding of different projects' potential impacts and how their zones of influence may interact; detailed knowledge on location is crucial to this.</p> <p>The Applicants would point to NGV's Deadline 9 submission (REP9-062) setting out the current status of the Nautilus and Eurolink projects. This states that NGV's siting and routeing options for the projects will not be presented until later in 2021 and that Environmental Impact Assessment (EIA) scoping will not occur until the first quarter of 2022.</p>



ID	ESC Comment	Applicants' Comments
	<p>and the limited depth of the detail contained within the document. ESC considers there is sufficient time available before the end of the examinations, given the three-month extension granted, should the Examining Authority determine that further assessment is necessary for this to be provided. To assist the Examining Authority, ESC has however used its experience and knowledge in relation to the potential impacts of the projects to provide further comments below.</p>	
30	<p>Section 3 Screening</p> <p>ESC considers there remains the potential for the construction works in relation to the EA1N and EA2 projects to crossover with the construction works associated with the Nautilus and Eurolink projects but accept that this is unlikely given the timeframes provided. It is also noted that no detailed information has been published by NGV in relation to the construction activities and timescales associated with these projects and therefore a significant number of assumptions would need to be made.</p> <p>Table 3.1 'Screening of Potential Cumulative Impacts' identifies that the National Grid extensions could potentially increase the magnitude of effects in relation to onshore ecology and onshore ornithology, increase the level of visual change resulting in additional harm to the significance of heritage assets and cause direct physical landscape effects, an intensification of significant effects on local landscape character and increase the lateral spread and influence of the National Grid substation in local views. ESC agrees with the screening in of these impacts. However, in addition to the matters identified as contributing to the cumulative effects of the projects, ESC considers that operational noise and flood risk</p>	<p>The Applicants refer to their response at ID29. While certain details for Nautilus and Eurolink (e.g. basic construction methods and infrastructure to be installed) are likely to be similar to NGV's previously constructed interconnector projects, there is no information on either project's potential environmental impacts, which like location, is also crucial to CIA.</p> <p>The National Grid equipment for the extension is assumed to be no different to that proposed for the Projects and assessed within the Noise Modelling Clarification Note submitted at Deadline 4 (REP4-043) and therefore are not contributing factors to the received noise levels at SSR2, SSR3 and SSR5 NEW.</p> <p>Regarding flood risk and drainage, other than hypothetical locations for the National Grid substation extensions, there is no information available on either the design or scale of any extension and how this might affect flood risk and drainage at the site or in the local area, nor on how NGV might mitigate any issues. This would require NGV to undertake modelling and design work in advance of completing its site selection exercise or undertaking EIA scoping.</p> <p>The indicative footprint of the extensions shown on Figure 1 of the Extension of National Grid Substation Appraisal (REP8-074) amounts to approximately 2.48ha. It is not guaranteed that the whole of this area would be required for development should the extensions to the National Grid substation be</p>



ID	ESC Comment	Applicants' Comments
	<p>and drainage should be included within scope for further consideration in Section 4.</p> <p>ESC notes that the Applicants have assumed in Table 3.1 that <i>'the extensions will be required to not contribute any increase to the noise limits proposed for the projects, therefore they will be designed so that there are no cumulative impacts during the operation phase'</i>. ESC notes that such a restriction would impose a stricter limit than applied to the developments subject of the current DCO applications which exceed the existing background sound climate of the locality. ESC has no information to demonstrate that this assumption is achievable and therefore the basis for 'screening out' operational noise and vibration is not agreed with. ESC maintains that the proposed development creates a risk of background noise creep from future connections projects in the area and considers that operational noise should be considered further in Section 4.</p> <p>The western extension to the National Grid substation, as the Applicants have identified within the document, <i>"would encroach further into the existing surface water flow path and possibly into the location of the sustainable drainage system (SuDS) basins proposed as part of the projects."</i> It is noted that the Applicants state that the existing flow path is likely to be diverted and the final details of the size and location of the SuDS basin is not yet known. The extension to the examination has however provided the Applicants more time to be able to consider the design of this further. ESC considers that drainage and flood risk should be included within the scope of Section 4.</p>	<p>consented and constructed in the future; however, it is considered to represent a reasonable worst case footprint. Using the assumptions presented within the Outline Operational Drainage Management Plan (REP8-064), initial modelling suggests that the National Grid substation sustainable drainage system (SuDS) basin would require SuDS attenuation for the following (approximate) amounts under each of the drainage scheme options presented within the Outline Operational Drainage Management Plan (REP8-064):</p> <ul style="list-style-type: none"> • <u>Infiltration only scheme:</u> Approximate additional surface area = 6,300m² Approximate additional storage capacity required = 6,000m³ • <u>Hybrid scheme:</u> Approximate additional surface area = Approximately 5,000m² Approximate additional storage capacity required = 5,600m³ • <u>Attenuation only scheme:</u> Approximate additional surface area = 3,800m² Approximate additional storage capacity required = 3,400m³ <p>The Applicants will address the surface water flow path relevant to the Projects within the final Operational Drainage Management Plan and it will be for the developer of any extensions to consider the existing environment at the point of their application.</p> <p>It will also be for the developer of any extensions to consider surface water management and drainage options as part of a separate application. If such an application were successful, the developer would need to demonstrate that its proposed drainage and surface water management scheme meets the requirements of local (Suffolk County Council) and national policy (i.e. agreed</p>



ID	ESC Comment	Applicants' Comments
		<p>surface water discharge rates and storage capacity) to ensure that there is no increase in flood risk or surface water runoff. The Applicants anticipate that the design and implementation of a final drainage scheme would be secured through conditions or requirements specified within the consent for any extensions. The Applicants cannot undertake design work on behalf of NGV.</p>
31	<p>Section 4 Cumulative Appraisal 4.1 Onshore Ecology</p> <p>As noted in paragraph 30 the eastern extension could result in the loss of part of the woodland known as Laurel Covert. As identified on MAGIC Map (accessed 30/03/2021) Laurel Covert is lowland mixed deciduous woodland which is a UK Priority habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). The eastern extension would therefore potentially result in the loss of a small area of UK Priority habitat.</p>	<p>The Applicants would note that the text in section 4.1 of REP8-074 states that the loss of woodland at Laurel Covert would only occur assuming no mitigation is applied; NGV would need to determine whether or not the loss is necessary through its own design process. This highlights the difficulties of undertaking such appraisal work when there is no information available for one of the projects under consideration.</p>
32	<p>4.3 Landscape and Visual</p> <p>ESC notes that from some viewpoints the extensions to the currently proposed National Grid substation will appear as a widening of the visual impact of the overall substation complex, whilst from others it will be regarded as part of the existing infrastructure. As discussed throughout the current examinations, the duration of visual impacts will very much depend on the successful establishment of the proposed screen planting which, like the full scope of these proposed extensions, carries a degree of the unknown about it. ESC can acknowledge that there are unlikely to be any significant additional impacts on landscape character given that the extensions will be additions, to what will by then be, if consented, a substantial complex of industrial scale infrastructure.</p>	<p>Noted. No further comment.</p>



ID	ESC Comment	Applicants' Comments
33	<p>4.4 Cultural Heritage</p> <p>ESC notes that the extensions to the National Grid Substation will further sever views between the heritage assets at Friston Moor and the Church, thereby further obstructing their connections. The western extension, in particular, will obscure views to the Church from the north. While there would as a consequence be an increase in the harm caused to the heritage assets, it is not considered that the significance of the effects would be raised from moderate to major (for Little Moor Farm, High House Farm and Woodside Farm). ESC however maintains that the impacts will be greater than identified by the Applicants and this remains a matter of professional disagreement. A more detailed explanation of the ESC's position was provided within REP5-048.</p>	<p>Noted. No further comment.</p>
34	<p>The appraisal provides some useful information but as stated previously, it is not a cumulative impact assessment and only contains a limited degree of information therefore it is not possible for ESC to provide more detailed comments at this stage.</p>	<p>The Applicants refer to their response at ID29.</p>
Substations Design Principle Statement – REP8-082		
35	<p>General</p> <p>ESC notes and acknowledges the Substations Design Principles Statement as a useful basis for further discussions on detailed aspects of substation design.</p> <p>Although the issues that the landscaping proposals address are noted, it also needs to be recognised that the mitigation planting proposals in their own right have the potential to alter the visual receptors' experience of the local landscape in certain views. ESC</p>	<p>Noted. The Applicants recognise that the introduction of any structure, human or natural, will affect visual receptors' experience of the local landscape and the setting of heritage assets. This is assessed within Chapter 29 (APP-077) and Appendix 24.7 (APP-519 to APP-520) of the ES, both updated by Landscaping and Visual Impact Assessment Addendum (REP4-031) Heritage Assessment Addendum (REP4-006). It is deemed that sufficient recognition of this matter has been given in previous submissions and it is not considered necessary or useful to raise this matter again within the Substations Design Principles Statement (REP8-082).</p>



ID	ESC Comment	Applicants' Comments
	<p>also maintains that the mitigation planting although welcomed for its visual screening does not mitigate the harm caused to the setting of heritage assets.</p>	
36	<p>Section 4.3</p> <p>The third bullet point within the list of improvements stating, '<i>lowering of the finished ground levels at the location of the eastern onshore substation and National Grid substation</i>', could potentially cause some confusion. This point is however explained more clearly in paragraph 38 when it is referred to as the '<i>refinement of the estimated finished ground levels</i>' and also in Section 6. ESC notes that the Applicants have maintained during the examinations that they cannot commit to a maximum finished ground level.</p>	Noted.
37	<p>Section 4.6 (Onshore Ecology).</p> <p>Whilst delivery of genuine ecological enhancement at the substations site will be reliant on good implementation and long-term management of the created habitats, it is acknowledged that the landscape planting proposed has the potential to also deliver some ecological enhancement when compared with the baseline condition. However, the degree to which these habitats will be used by more disturbance sensitive species (such as bats) is unknown and will depend on the final operational noise and light levels.</p>	<p>Noted. The Applicants consider that comprehensive efforts have been and will be made to design and establish landscape planting and other habitats that will provide suitable habitat for wildlife. Extensive consideration of the existing habitats and features, proposed planting species mixes, planting locations and habitat types has been taken in preparing the Outline Landscape Mitigation Planting scheme as presented within the OLEMS (document reference 8.7). The Applicants have demonstrated that implementation of the proposed planting scheme will provide new habitats and complement and enhance existing habitats.</p>
38	<p>ESC remains concerned regarding the potential impacts on bats as a result of the operational noise from the substations which has been previously set out in the Local Impact Report (REP1-132) and subsequent submissions to the examinations(REP3-094, REP5-048, REP6-075, REP7-063). Although not directly relevant to the Substation Design Principles Statement, it is considered important</p>	<p>Noted. Whilst ESC deem it not directly relevant to the Substations Design Principles Statement (REP8-082), the Applicants consider that the preparation and prior approval of an Operational Noise Design Report secured through Requirement 12 of the draft DCO (document reference 3.1), and expanded upon within the Substations Design Principles Statement, presents an</p>



ID	ESC Comment	Applicants' Comments
	to raise this matter again at this point in the examination as there remains time to address this issue.	appropriate mechanism for controlling operational noise at frequencies considered to potentially affect bats.
39	<p>Section 4.7 Noise</p> <p>ESC welcomes the Applicants' commitment to minimise the operational noise rating level below the limits set out in Requirement 27 of the DCOs by incorporating Best Practicable Means in noise control at the detailed design stage, subject to the consideration of specific matters outline in paragraph 71.</p>	Noted. The Applicants are pleased to have reached an agreed position with ESC on the control of operational noise.
40	<p>Table 5.1 – Reduction of visual impact of onshore substations, National Grid substation and cable sealing end compounds</p> <p>ESC welcomes the Applicants commitment to seek further reductions to the visual extent of the onshore substations, National Grid substation and cable sealing end compounds. It is noted that this is subject to the caveat, '<i>where cost effective and efficient</i>'. ESC expects that all reasonable efforts will be made to achieve a reduction in the impacts of the infrastructure.</p>	Noted.
41	<p>Table 5.1 - The cable sealing end compounds will be aligned to existing field boundaries where possible</p> <p>ESC welcomes the commitment to align the cable sealing end compounds to field boundaries where possible.</p>	Noted.
42	<p>Table 5.1 - Operational equipment will be designed and installed to maintain low noise levels of no more than 31dBA at SSR2 and SSR5 (NEW) and 32dBA at SSR3</p> <p>ESC support the inclusion of this additional design principle in relation to the operational noise and welcome the commitment 'to</p>	Noted. The Applicants are pleased to have reached an agreed position with ESC on the control of operational noise.



ID	ESC Comment	Applicants' Comments
	<p><i>minimise the operational noise rating level below the limits set out in Requirement 27 of the draft DCO (REP7-006) and avoid any perceptible tones and other acoustic features at any residential receptor that would attract a correction in accordance with BS4142:2014+A1:2019, insofar as these mitigation measures do not add unreasonable costs or delays to the Projects or otherwise result in adverse impacts on other aspects of the environment (e.g. landscape and visual impacts).'</i></p>	
43	<p>Table 5.1</p> <p>ESC maintains its support for the inclusion of an additional design principle as worded below:</p> <p><i>The detailed design of the project and the procurement processes that support it, will both engage with, respond to, and in so far as practicable, adopt and adapt to, any new opportunities arising from emerging new technologies and changes to legislation and regulations, in order to minimise the harms to the receiving environment and maximise the benefits of the project through good design. Engagement with the opportunities that may be offered from emerging technological, regulatory, and legislative change is a fundamental principle, that will be applied at all times, during the design procurement and development process.</i></p> <p>Following further discussions with the Applicants, it has been confirmed that engagement in relation to the design of the substations and infrastructure has already started to occur and will continue to do so. ESC has been advised by the Applicants that it is not anticipated that there would be a significant delay between the consent of the projects, if the Orders are made, and their design. This is reflected within the timescales provided within the</p>	<p>The Substations Design Principles Statement (REP8-082) provides sufficient control and flexibility to ensure an appropriately designed onshore substation and National Grid substation is developed which meets each and every constraint and parameter set out within the DCO. In particular, the following design principles are noted:</p> <ul style="list-style-type: none"> • Reduction of visual impact of onshore substations, National Grid substation and cable sealing end compounds (i.e. where cost effective and efficient to do so, the Applicants will seek to further reduce the visual extent of the onshore substations, National Grid substation and cable sealing end compounds, through appropriate equipment procurement and layout considerations). • Operational equipment will be designed and installed to maintain low noise levels of no more than 31dBA at SSR2 and SSR5 (NEW) and 32dBA at SSR3. The Applicants will seek to minimise the operational noise rating level below the limits set out in Requirement 27 of the draft DCO (REP8-003) and avoid any perceptible tones and other acoustic features at any residential receptor that would attract a correction in accordance with BS4142:2014+A1:2019, insofar as these mitigation measures do not add unreasonable costs or delays to the Projects or



ID	ESC Comment	Applicants' Comments
	<p>engagement set out in Appendix A of the Substation Design Principles Statement (REP8-082). Therefore although ESC would like to see this additional principle included within the Substation Design Principles Statement, it is accepted that this is not a matter upon which the Applicants and ESC are likely to agree and that if the Applicants proceed on the timeframe envisaged there is unlikely to be significant changes to available technologies, current policy or regulations. However, in the event of any project delays the omission of the proposed principle could be potentially significant, particularly given the rapidly changing policy and regulatory environment. It for this reason that the position that the proposed principle should be included is maintained.</p>	<p>otherwise result in adverse impacts on other aspects of the environment (e.g. landscape and visual impacts).</p> <ul style="list-style-type: none"> • Consider 'Good Design' in line with the requirements of Overarching National Policy Statement for Energy (NPS EN-1) and the National Infrastructure Commission's 'Design Principles for National Infrastructure' (National Infrastructure Commission, February 2020). • The visual impacts of the substation buildings will be minimised as far as possible by their sensitive placing, the use of appropriate design, building materials, shape, layout, coloration and finishes. <p>The design will optimise generation of renewable energy to displace carbon emissions and meet national and international carbon reduction and renewable energy targets, in line with the project objectives.</p>
44	<p>Appendix A: Engagement Strategy Paragraph 21</p> <p>ESC notes the inclusion of an additional stage to the engagement process and provision of an independent chair for the stakeholder engagement workshops which are welcomed.</p> <p>The Applicants have committed to engage directly with the occupiers of the properties identified within the bullet points. It is noted that this list does not however include the group of six properties located to the south of the substations site close to the junction of Church Lane and Grove Road, The Lindens, Saxmundham Road or Woodside Cottages, Grove Road. As these properties are close to the proposed substations and the Environmental Statements identify that there will be significant visual effects as a result of the development in these localities, it is considered that these properties should also be included in the list.</p>	<p>The Applicants will amend Paragraph 21 of Appendix A: Engagement Strategy of the Substations Design Principles Statement (REP8-082) at a later Dealdine, to include the owners of the following properties within the Engagement Strategy:</p> <ul style="list-style-type: none"> • The group of six properties located to north of Church Road at the junction of Church Road/Grove Road; • The Lindens, Saxmundham Road; and • Woodside Cottages, Grove Road.



ID	ESC Comment	Applicants' Comments
Different Colour Scheme for Substation Design Principles Statement – Viewpoint 1 – REP8-066, Viewpoint 2 – REP8-067 and Viewpoint 9 – REP8-068		
45	ESC considers the provision of these additional viewpoints illustrating different colour choices for external materials to be interesting and useful if not necessarily conclusive. It is noted that they do show that the appropriate choice of colour in large scale rural building can be a very elusive subject, very often highly influenced by variable weather conditions. These visualisations will assist discussions and further consideration of this matter at a later stage of the process particularly during the engagement strategy described in Appendix A of the Substations Design Principles Statement (REP8-082).	Noted. No further comment.
Cultural Heritage Viewpoint 5 Additional Visualisations – REP8-063		
46	ESC noted in previous responses that the usefulness of CHVP5 is limited due to the specific location the viewpoint was chosen from (REP4-059). These additional visualisations are therefore welcomed, as they give a better idea of how the setting of Woodside Farm would be impacted. The visualisations confirm previous assumptions, that the top of the substations would still be visible above the treeline at 15 years, and that the large scale of the substations would still be notable. ESC maintains its position that the magnitude of adverse impact would be medium, giving rise to an effect of moderate significance (page 31/32, REP5-048).	Noted. No further comment.
National Grid GIS Substation Photomontages		
47	The provision of updated photomontages showing the Gas Insulated Switchgear (GIS) Substation option are welcome. The	Noted. The Applicants maintain that, on balance, they consider an Air-Insulated Switchgear (AIS) solution for the National Grid substation to be a worst-case



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	<p>overall footprint of the National Grid substation is significantly smaller although the building structures associated with this technology would be taller and have a larger solid mass than the Air Insulated Switchgear (AIS) substation option.</p> <p>The Environmental Statements are based on the use of an AIS National Grid substation, and although the photomontages are useful, no equivalent assessment to that within the Environmental Statements has been provided in relation to a GIS National Grid substation. Without a full assessment of the GIS option, it is not possible for ESC to fully compare the impacts of the two technologies and assess the degree to which one technology is beneficial over the other. The lack of a full assessment of the GIS option also limits the Examining Authority's ability to recommend to the Secretary of State that one technology should be favoured over another and prevents the ability for only the GIS option to be consented by the DCOs.</p> <p>Based on the information available, the comments contained within paragraphs 14.13 to 14.14 of the Local Impact Report (REP1-132) remain relevant.</p>	<p>scenario, given the area of the required footprint and associated spread of electrical equipment. As such, and in line with the Rochdale envelope approach to assessing potential environmental impacts, an assessment of landscape and visual effects has been undertaken based upon an AIS solution for the National Grid substation as presented within Chapter 29 of the ES (APP-077) and the Landscape and Visual Impact Assessment Addendum submitted at Deadline 4 (REP4-031).</p> <p>In recognition of the evolution of design commitments as detailed within the Substations Design Principles Statement (REP8-082), the Applicants intend to undertake an assessment of a Gas-Insulated Switchgear (GIS) National Grid substation and will submit this at Deadline 11.</p>
<p>Outline Code of Construction Practice – REP8-017</p>		
48	<p>Section 3.1 Paragraph 40</p> <p>ESC notes and welcomes the additional wording included within paragraph 40 which reflects the amended wording contained within Requirements 23 and 24 of the draft DCOs (REP8- 003). This provides confirmation that ESC's approval as to whether an activity is essential is required for works which are not expressly detailed</p>	<p>Noted. The Applicants consider this matter closed and have no further comment.</p>



ID	ESC Comment	Applicants' Comments
	within paragraph (2) of the Requirements, in addition to the timing and duration of the works.	
49	<p>Paragraph 41</p> <p>Further details regarding the time period within which ESC will be advised regarding any emergency works which have had to be undertaken is also noted in paragraph 41.</p>	Noted. No further comment.
50	<p>Section 9.1, paragraphs 97, 98, 99, 100</p> <p>ESC notes the intention for the Applicants' contractors to submit applications in relation to construction works for consent under Section 61 of the Control of Pollution Act 1974 (COPA). The confirmation that the applications will assess the noise impact using the ABC assessment method set out in Annexe 4 of BS5228 and contractors will use Best Practicable Means to minimise construction noise as far as reasonable and practical to do so, is supported. The applications will also include details of monitoring and monitoring locations.</p>	Noted.
51	<p>Paragraph 42 and 103</p> <p>Confirmation of the core working hours and the activities which can be undertaken during the shoulder hour either side of the core hours are noted. Paragraph 103 sets out the best practicable noise mitigation measures which would typically be implemented, this provides an outline of appropriate measures, further measures may however be considered necessary as part of the final document.</p>	Noted. The Applicants consider this matter closed for the purposes of the Examinations and have no further comment at this stage, although note that further consideration of best practicable noise measures will be given when preparing the final Code of Construction Practice (CoCP).
52	Paragraph 105	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
	<p>ESC supports the commitment to engage with the occupants of specific noise sensitive receptors and the incorporation of specific measures into the applications submitted under Section 61 of COPA.</p>	
53	<p>Sections 9.1.2, 9.1.3, 9.1.4 and 9.1.5</p> <p>The Applicants have committed to providing specific noise mitigation proposals for landfall construction, the onshore cable route, construction works near the Wardens Trust, and the onshore substation construction respectively. The measures identified, as previously stated in REP8-151, are considered proportionate and relatively well considered.</p>	<p>The Applicants welcome ESC's comments and consider this matter closed.</p>
54	<p>Section 9.3</p> <p>ESC considered that the agreement at Issue Specific Hearing 12 (ISH12) was on the general principles of using Lowest Observed Adverse Effect Levels (LOAELs) and Significant Observed Adverse Effect Levels (SOAELs) and adopting different limits for different time periods, which was the approach taken in Table 5 of the Cobbing Report (REP7-041) and therefore expected the implementation of this table in the OCoCP to reflect the specific nature and context of this scheme. Therefore although this table is contained within the OCoCP, paragraph 100 clarifies that the applications under Section 61 of COPA will assess the noise impact from construction noise using the ABC assessment method set out in Annexe 4 of BS5228; this is ESC's preference and therefore this wording is supported.</p>	<p>Noted. The Applicants are pleased to have reached an agreeable position on the inclusion of the table of Lowest Observed Adverse Effect Levels (LOAELs) and Significant Observed Adverse Effect Levels (SOAELs) within the Outline CoCP (document reference 8.1) with ESC and that the approach to controlling construction noise is agreed.</p>
55	<p>Paragraph 127</p>	<p>Whilst the suite of measures set out within the Institute of Air Quality Management (IAQM) guidance are considered to be comprehensive and the</p>



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	<p>The OCoCP (paragraph 127) contains a commitment to implementing specific mitigation measures in specific areas sensitive to air pollution, “<i>where practicable</i>.” This is designed to fulfil an undertaking made by the Applicants in Statement of Common Ground LA04.28 (REP8- 114), which was then due to be reviewed by ESC. However, this does not deliver what ESC was expecting. ESC is looking for a commitment to specific mitigation to reflect the quantities of materials, nature of soils and coastal setting with potentially higher wind speeds, all of which would be different to more standard construction projects (this was flagged in ESC’s Local Impact Report section 7.21 and 7.22 (REP1-132) and also highlighted in ESC’s Deadline 7 submission section 3.15 (REP7-063)). ESC anticipates that specific further or amended mitigation measures may be needed in the light of these factors. These measures do not need to be specified at this stage, but ESC requests that the OCoCP should contain the following commitment which can be expanded on when finalising the CoCP post-consent: “<i>In view of the magnitude of earthworks, potentially dusty nature of materials, and coastal setting of construction activities, consideration will be given to specifying dust mitigation measures which go beyond those specified in the relevant IAQM guidance used in the Environmental Statement.</i>”</p> <p>The phrase “<i>where practicable</i>” is of potential concern to ESC. In situations where necessary mitigation measures cannot be provided for reasons of practicality, these reasons should be fully explained to ESC, and consideration should be given to alternative means of dust control.</p>	<p>measures set out within the Outline CoCP (document reference 8.1) accord with these, the Applicants will consult with the relevant planning authority on the final suite of measures to be implemented during the preparation of the final CoCP post-consent. It is therefore acknowledged that the final CoCP may require additional measures covering certain sensitive areas once these have been identified.</p> <p>Existing provisions within the Outline CoCP commit the Applicants to identifying higher-sensitivity areas (including consideration of soil types, proximity to the coast (with higher wind speeds) and positions of stockpiles) and implementing additional measures with regard to mitigating potential air quality impacts.</p> <p>The Applicants have removed reference to ‘<i>where practicable</i>’ in this instance within the Outline CoCP (document reference 8.1) and amended the text with a commitment to discuss mitigation measures with the relevant planning authority during preparation of the final CoCP. The additional wording of the updated Outline CoCP specifies that, where specific mitigation measures proposed by the relevant planning authority are not deemed to be practicable, the rationale for this will be explained within the final CoCP. An updated Outline CoCP has been submitted at Deadline 10.</p>
56	Paragraphs 111, 112 and 135	The Applicants welcome ESC’s comments and consider this matter closed.



ID	ESC Comment	Applicants' Comments
	<p>There has been a minor change to extend the zones where traffic speeds will be limited to 10 mph on all construction roads and where temporary noise barriers will be installed (from 75 m to 100 m away from sensitive locations). While this was not a specific request from ESC, this is welcomed.</p>	
57	<p>Paragraph 139</p> <p>The commitment on NRMM has been clarified to require stage IV emissions standards or better (paragraph 139). However, the wording “where possible” has been introduced. It is reasonable to include this caveat, but ESC requests an additional measure be included in the OCoCP in the light of this caveat, to ensure that any impacts from higher emitting plant are avoided, as follows: <i>“If Stage IV plant is not possible, ESC requests that the reasons for this should be provided to ESC, and any such plant should be deployed in locations as far away from sensitive receptors as practicable.”</i></p> <p>As highlighted in ESC’s Summary of Representation Issue for Specific Hearing 7 – Biodiversity and Habitat Regulations Assessment (REP6-075), ESC requests that suitable safeguards regarding the location, number and capacity of NRMM to be used in locations close to the Sandlings Special Protection Area (SPA) and Leiston-Aldeburgh SSSI should be included in the OCoCP.</p> <p>As highlighted elsewhere, ESC remains concerned that the potential for an impact on nature conservation still exists, in particular at the landfall. While ESC has deferred to Natural England to lead on issues of air quality impacts on designated sites, ESC notes this matter remains outstanding although further information supplied by the Applicants at Deadline 6 has been noted. Subject to further advice from Natural England, ESC has</p>	<p>Noted. The Applicants note that the Outline CoCP (document reference 8.1) was updated at Deadline 8 with a commitment for Non-Road Mobile Machinery to comply with Stage IV emissions standards under EU Directive 97/68/EC or later, where possible.</p> <p>At Deadline 10, the Applicants have updated the Outline CoCP (document reference 8.1) with a commitment to discuss mitigation measures with the relevant planning authority during preparation of the final CoCP. The additional wording of the updated Outline CoCP specifies that, where specific mitigation measures proposed by the relevant planning authority are not deemed to be practicable, the rationale for this will be explained within the final CoCP. It follows that the final CoCP will include a rationale should the use of Stage IV NRMM for particular works not be practicable.</p> <p>The Outline CoCP has also been updated with the following commitment regarding the position of NRMM in relation to designated sites of nature conservation:</p> <p><i>Prior to construction, the Applicant will identify the positioning and orientation of plant and equipment involved with the landfall construction in consideration of sensitive air quality receptors where practicable. This will be undertaken with cognisance of the proximity of working areas in relation to the designated sites of nature conservation (i.e. Leiston – Aldeburgh SSSI).</i></p> <p>As such, the Applicants confirm that a consideration of both noise sensitive receptors and air quality impacts will inform the positioning and orientation of plant and equipment required for landfall construction. However, the Applicants</p>



ID	ESC Comment	Applicants' Comments
	<p>also highlighted the need for the final landfall construction layout to include air quality impacts on the SSSI as a constraint, along with the need for monitoring and potentially additional mitigation measures if necessary. While this is partly captured in the Outline Landfall Construction Method Statement submitted at Deadline 8 (REP8-053), minimisation, assessment and mitigation of air quality impacts should be made more explicit.</p>	<p>are unable to make a firm commitment on restricting plant and equipment to certain areas within the Order limits within proximity to designated sites at this stage.</p>
58	<p>Section 14</p> <p>The Environmental Statements (section 19.3.5) recognises that <i>“monitoring is an important element in the management and verification of the actual impacts based on the final detailed design.”</i> Section 14 of the OCoCP does not contain any detail on monitoring. ESC agrees that details of monitoring arrangements can be agreed post-consent when finalising the CoCP. Please note that ESC will expect pro-active monitoring for NO₂, PM₁₀/PM_{2.5} and dust throughout the construction programme, as envisaged in (for example) ESC and SCC Joint Local Impact Report section 7.25 (REP1-132) and ESC Response to Deadline 7 paragraph 3.9 and 3.13 (REP7-063).</p>	<p>The Applicants welcome ESC's comments and consider this matter closed.</p>
59	<p>Appendix 3</p> <p>Appendix 3 details the engagement activities undertaken in relation to the East Anglia One project which would also be replicated for the EA1N and EA2 projects, this commitment is welcomed. ESC considers that engagement with the local community and affect persons is of vital importance ahead of and during construction works.</p>	<p>The Applicants welcome ESC's comments and consider this matter closed.</p>



ID	ESC Comment	Applicants' Comments
Landscape and Visual Sizewell C Cumulative Impact Assessment – REP8-075		
60	<p>ESC notes the findings and conclusions of this report. Inevitably the greatest likelihood of notably significant cumulative impacts will arise during construction phases rather than operational phases, and in this regard, much will depend on how much the construction phases overlap. Given that the dominant construction project will be Sizewell C in comparison to the EA1N and EA2 cable landing and cable laying to the south of Sizewell, additional elements such as the beach landing facility will only intensify effects that have already been acknowledged and where identified as 'significant' in Landscape and Visual Impact Assessment (LVIA) terms, have already been noted. It is noted that the document identifies that the landscape and visual conclusions presented do not change the EA1N and EA2 projects' cumulative impact assessment conclusions presented within the Environmental Statement and REP2-010. The positional disparity between added Sizewell C activity and the location of EA1N and EA2 activity suggests that the conclusions of this appraisal are largely realistic. It is agreed that operational cumulative effects are not significant.</p>	<p>Noted. In light of ESC's agreement with the conclusions, the Applicants consider this matter closed and have no further comment.</p>
Outline Construction Traffic Management Plan – REP8-021		
61	<p>Paragraphs 84-87</p> <p>ESC understands that there is currently no confirmation of the works anticipated at Work No.37. As a result, the Outline Construction Traffic Management Plan (OCTMP) does not provide confirmation that risk of air quality impacts due to works in Work No.37 can be ruled out. ESC is still seeking confirmation of the nature of construction works in this area and the potential effects on</p>	<p>The Applicants signpost to section 2.3 of their Summary of Oral Case Issue Specific Hearing 13 (REP8-098), which identifies the anticipated works to Marlesford Bridge in the event that the Port of Felixstowe is selected to serve as the construction port for the Projects. It should be noted that the duration (an anticipated period of two days) and extent of such works are unlikely to result in significant air quality impacts in relation to annual mean concentrations. As such, further assessment is not considered necessary.</p>



ID	ESC Comment	Applicants' Comments
	<p>traffic congestion/diversionary routes to enable a decision to be taken on whether there is a risk of significant adverse impacts on air quality. Alternatively, if this information cannot be provided, the OCTMP could be updated to provide a commitment that once further information is known the Applicants will consider the effects on air quality at this stage and if further assessment is necessary, this will be provided.</p>	
62	<p>Paragraphs 137-143, 144, 146</p> <p>The Euro class monitoring requirements as agreed between the Applicants and ESC are incorporated in paragraph 137-143.</p> <p>ESC requests an amendment to provide for provision of information on Euro standards of vehicle fleet on a monthly basis during the initial 3 months (rather than on a quarterly basis as currently envisaged), so that an early assessment of performance can be made. This would enable prompt action to be taken to address any potential problems. This would require an amendment to OCTMP paragraphs 144 and 146.</p>	<p>The Applicants note that the current wording of paragraph 140 of the Outline Construction Traffic Management Plan (CTMP) (document reference 8.9) allows for this, stating “...<i>monitoring and reporting of all HGV delivery vehicles will be undertaken over an initial three month period (following commencement of construction of the temporary haul road)</i>”.</p> <p>The Applicants will update the Outline CTMP (document reference 8.9) with a commitment to monitor and report compliance with the specified Euro standards on a monthly basis within the initial three month period (following commencement of construction of the temporary haul road).</p>
<p>Outline Port Construction Traffic Management and Travel Plan – REP8-091</p>		
63	<p>General Comments</p> <p>This document now includes an undertaking to carry out an air quality screening assessment in accordance with IAQM guidance, as requested by ESC. ESC has no further comments in relation to the air quality aspects of this document.</p>	<p>Noted. No further comment.</p>
<p>Applicants' Comments on the Report on Implications for European Sites – REP8-094</p>		



ID	ESC Comment	Applicants' Comments
64	<p>This document states: "With regard to onshore matters, the Applicant is awaiting comments from NE which are due to be submitted at Deadline 8".</p> <p>ESC notes that no new information relevant to air quality impact assessments could be found in Natural England's Deadline 8 submissions. Following the extension to the examinations, ESC will review Natural England's comments when they are submitted.</p>	Noted.
Applicants' Written Summary of Oral Case ISH12 - REP8-097		
65	<p>Paragraph 6</p> <p>ESC maintains that the agreement in the hearing was on the general principles of using LOAELs and SOAELs and adopting different limits for different time periods, which was the approach taken in Table 5 of the Cobbing Report (REP4-041) and therefore expected the implementation of this table in the OCoCP to reflect the specific nature and context of this scheme. However, this issue has been resolved with the Applicants following ISH12, and ESC welcome the changes made to the final OCoCP submitted by the Applicants at Deadline 8 (REP8-017).</p>	Noted. The Applicants are pleased to have reached an agreed position on the inclusion of the table of LOAELs and SOAELs within the Outline CoCP (document reference 8.1) with ESC and that the approach to controlling construction noise is agreed.
66	<p>Paragraph 11 & 12</p> <p>ESC highlights that the operational noise rating limits in the DCOs are set at 31 dB LAr at Little Moor Farm, Knodishall and 32 dB LAr at other receptors and not at 35 dB LAr. The Applicants' have subsequently confirmed to ESC that the noise rating limits were set according to the lowest noise levels that could be committed to at this stage following engagement with the supply chain, but that they are committed to reducing noise levels below these limits where</p>	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
	<p>possible by incorporating Best Practicable Means in noise control at the detailed design stage. This new approach is welcomed by ESC, who agree that this is in accordance with Paragraph 5.11.9 of the Overarching National Policy Statement for Energy (EN-1).</p>	
67	<p>Paragraph 14</p> <p>ESC welcomes the Applicants' commitment to minimise the operational noise rating level below the limits set out in Requirement 27 of the DCOs by incorporating Best Practicable Means in noise control at the detailed design stage and accept that this is compliant with the various planning policies relating to noise. However, ESC maintains that noise levels at the operational noise at the limits set out in the DCOs will permanently alter the noise climate in the surrounding area. This will change the context of any future noise assessments for future connection project and create a significant risk of background noise creep in the surrounding area should future connections be approved.</p>	<p>It will be for the developer of any future project connecting into the National Grid substation at Friston to comply with the policies and assessment criteria regarding noise at that time. In doing so, the respective developer will be required to propose and implement suitable noise mitigation measures required to comply with the relevant policies and avoid or otherwise mitigate noise impacts to within acceptable levels.</p>
Applicants' Written Summary of Oral Case ISH15 – REP8-101		
68	<p>Paragraphs 12-14</p> <p>ESC maintains the view (REP6-080, REP8-149) that in the interests of clarity Article 37(2) should be revised to explicitly include the relevant planning authority and the highway authority as excluded from the application of Article 37(1), alongside the Secretary of State and Marine Management Organisation. Although the general excluding words in Article 37(1) are noted, there is no reason to expressly exclude the Secretary of State's jurisdiction and not the relevant planning authority's for example. The Applicants' response at paragraphs 12 to 14 of REP8-101 is limited to comment on the</p>	<p>See Applicants' response at ID3.</p>



ID	ESC Comment	Applicants' Comments
	Marine Management Organisation's position and does not address the more relevant comparator of the Secretary of State.	
69	Sections 3.2.5, 3.2.6, 3.2.7, 3.2.8 and 3.2.9 ESC notes and welcomes the revisions to Requirements 12, 13, 15, 23, 24 and 27.	The Applicants welcome this position.
70	Section 3.2.11 ESC has expressed concern regarding the deemed consent provision previously provided within Schedule 16 of the draft DCOs and therefore welcomes the Applicants commitment to remove this approval mechanism.	The Applicants welcome this position.
Applicants' Position Statement on Noise – REP8-039		
71	Section 2.1 Background Sound Level Disagreements on the appropriate analysis methodology to determine representative figures for background sound levels remain unresolved. ESC maintain that the analysis methodologies used to determine the figures reported in Appendix 4 of the Local Impact Report (REP1-132) are the most appropriate in each instance and that the figures presented by the Applicants overestimate the true background sound level.	The Applicants consider that the Examining Authority is fully aware of the opposing positions relating to the derivation of background sound levels and have no further comment regarding this matter. The Applicants position on background sound levels is set out within the following submissions: <ul style="list-style-type: none"> • Applicants' Position Statement on Noise (REP8-039); • Section 2.2 of the Applicants' Comments on ESC's Deadline 6 Submissions (REP7-057); • Section 2.4 of the Applicants' Comments on ESC's Deadline 5 Submissions (REP6-026); • Appendix 2 of the Applicants' Comments on ESC's Deadline 4 Submissions (REP5-010); • Section 2.2 of the Applicants' Comments on the Councils' Deadline 3 Submissions (REP4-025); and



ID	ESC Comment	Applicants' Comments
		<ul style="list-style-type: none"> • Applicants' Response to Appendix 4 of the Local Impact Report (REP3-071).
72	<p>Section 2.2 Assessment Method</p> <p>ESC agrees with the principle that there is a lower limit where the LOAEL reaches an absolute threshold irrespective of how far below this the background sound level is. However, ESC does not agree with the Applicants' assertion (based on an interpretation of the superseded version of the standard) that this level is 35 dB LAr. ESC maintains that the noise from the substations at limits set in Requirement 27 will have an adverse impact but accept rating levels below the operation limits will be below the threshold of significant adverse impact (SOAEL).</p> <p>Notwithstanding the areas of disagreement between the Applicants and ESC regarding background sound levels and the methodology used to determine the LOAEL, ESC's position is now that the operational limits secured in Requirement 27 are consistent with national policy requirements at this stage. This position is reached based on the information provided that the current rating limit is the lowest level currently achievable and due to the commitment to adopt Best Practicable Means to reduce noise levels further at the detailed design stage subject to the above caveats. ESC maintains that the operational noise rating level for the substations should be reduced to the background noise level in the event that this is found to be achievable and meets the Applicants' caveats.</p>	<p>The Applicants note the outstanding points of disagreement regarding setting of the LOAEL. Despite this, the Applicants are pleased to have reached an agreeable approach with ESC regarding the control of operational noise through updates to the wording of Requirement 12 and 27 of the draft DCO (document reference 3.1) and the Substations Design Principles Statement (REP8-082) submitted at Deadline 8.</p>
73	<p>Section 2.3 Background Sound Levels at SSR9</p> <p>ESC disagrees with the reasoning provided by the Applicants for substituting the measured noise data with substantially higher levels</p>	<p>The Applicants note the continued disagreement on this matter but have no further comment beyond referring back to their position as set out within the Position Statement on Noise (REP8-039).</p>



ID	ESC Comment	Applicants' Comments
	<p>measured elsewhere and maintain that the noise levels measured at SSR9 are consistent with the inherently quiet rural noise climate of the Friston area. However, ESC accepts that there is a lower limit where the LOAEL reaches an absolute threshold irrespective of how far below this the background sound level is. The disagreement therefore becomes one of the extent to which any receptors fall into the region between LOAEL and SOAEL thresholds, where the policy requirement is that all reasonable steps should be taken to mitigate and minimise adverse effects.</p>	
74	<p>Section 3.1 Correction for Tonal Characteristics</p> <p>ESC maintains that the inherent magnetostriction noise generation mechanism present in transformers and electrical transmission equipment mean that the equipment used in the onshore substations are highly likely to generate noise with strong tonal components at 100Hz and the related harmonic frequencies. ESC therefore agrees with SASES' position that the predicted rating levels should have +6dB tonality correction applied unless it can be shown with 1/3 Octave Band analysis that tonality and other acoustic features can be sufficiently controlled to avoid the need for an acoustic feature correction. However, ESC understands that the Applicants have now committed to providing a pre-commencement Operational Noise Design Report providing an assessment based on the detailed substation design and including 1/3 Octave band analysis of the final design proposals. This plan will require formal agreement from ESC; ESC is therefore satisfied that any concerns associated with the lack of consideration of tonality can be adequately considered at detailed design stage.</p>	<p>The Applicants note the continued disagreement on this matter but have no further comment beyond referring back to their position as set out within the Position Statement on Noise (REP8-039).</p> <p>In spite of this, the Applicants are pleased to have reached an agreeable approach with ESC regarding the control of operational noise through updates to the wording of Requirement 12 and 27 of the draft DCO (document reference 3.1) and the Substations Design Principles Statement (REP8-082) submitted at Deadline 8.</p>
75	<p>Section 3.2 Correction for Other Acoustic Characteristics</p>	<p>Noted. The Applicants welcome ESC's comment and have no further comment.</p>



ID	ESC Comment	Applicants' Comments
	ESC welcomes the Applicants' undertaking to a pre-commencement Operational Noise Design Report providing an assessment based on the detailed substation design, including consideration of constructive interference from coherent low frequency sources.	
76	Section 4 Construction noise ESC is satisfied with the revisions made by the Applicants to the OCoCP at Deadline 8.	Noted. The Applicants welcome ESC's comment and have no further comment.



2.2 Review of Actions Identified in the Local Impact Report (REP9-041)

ID	ESC Comment	Applicants' Comments
Section 6 – Principle of Development - ESC Lead Authority		
1	<p><u>Exploration of infrastructure consolidation in light of BEIS Offshore Transmission Network Review.</u></p> <p>The Applicants have stated that 'it is not envisaged that the review will lead to opportunities or outcomes which would be relevant to the delivery of the projects', the reasons for this position have been set out in their written summary of case for Issue Specific Hearing 2 (ISH2, REP3-085). Ofgem has also supported this view with their oral submission at ISH2 and further written submission provided at Deadline 4 (REP4-096).</p> <p>To allow the potential for the design of the projects to adapt to the changing policy and technological environments, ESC supported SCC's suggested wording for an additional design principle which could be incorporated into the Design Principles Statement (REP5-082):</p> <p><i>The detailed design of the project and the procurement processes that support it, will both engage with, respond to, and in so far as practicable, adopt and adapt to, any new opportunities arising from emerging new technologies and changes to legislation and regulations, in order to minimise the harms to the receiving environment and maximise the benefits of the project through good design. Engagement with the opportunities that may be offered from emerging technological, regulatory, and legislative change is a fundamental principle, that will be applied at all times, during the design procurement and development process.</i></p>	<p>The Substations Design Principles Statement (REP8-082) provides sufficient control and flexibility to ensure an appropriately designed onshore substation and National Grid substation is developed which meets each and every constraint and parameter set out within the DCO. In particular, the following design principles are noted:</p> <ul style="list-style-type: none"> • Reduction of visual impact of onshore substations, National Grid substation and cable sealing end compounds (i.e. where cost effective and efficient to do so, the Applicants will seek to further reduce the visual extent of the onshore substations, National Grid substation and cable sealing end compounds, through appropriate equipment procurement and layout considerations). • Operational equipment will be designed and installed to maintain low noise levels of no more than 31dBA at SSR2 and SSR5 (NEW) and 32dBA at SSR3. The Applicants will seek to minimise the operational noise rating level below the limits set out in Requirement 27 of the draft DCO (REP8-003) and avoid any perceptible tones and other acoustic features at any residential receptor that would attract a correction in accordance with BS4142:2014+A1:2019, insofar as these mitigation measures do not add unreasonable costs or delays to the Projects or otherwise result in adverse impacts on other aspects of the environment (e.g. landscape and visual impacts). • Consider 'Good Design' in line with the requirements of Overarching National Policy Statement for Energy (NPS EN-1) and the National Infrastructure Commission's 'Design Principles for National Infrastructure' (National Infrastructure Commission, February 2020)



ID	ESC Comment	Applicants' Comments
	<p>Following further discussions with the Applicants, it has been confirmed that engagement in relation to the design of the substations and infrastructure has already started to occur and will continue to do so. ESC has been advised by the Applicants that it is not anticipated that there would be a significant delay between the consent of the projects, if the Orders are made, and their design. This is reflected within the timescales provided within the engagement set out in Appendix A of the Substation Design Principles Statement (REP8-082). Therefore although ESC would like to see this additional principle included within the Substation Design Principles Statement, it is accepted that this is not a matter upon which the Applicants and ESC are likely to agree and that if the Applicants proceed on the timeframe envisaged there is unlikely to be significant changes to available technologies, current policy or regulations. However, in the event of any project delays, the omission of the proposed principle could be potentially important, particularly given the rapidly changing policy and regulatory environment. It for this reason that the position that the proposed principle should be included is maintained.</p>	<p>The visual impacts of the substation buildings will be minimised as far as possible by their sensitive placing, the use of appropriate design, building materials, shape, layout, coloration and finishes.</p>
2	<p><u>Commitment to simultaneous construction of EA1N and EA2 or as a minimum commitment to greater coordination in construction – first project installing ducting for the second.</u></p> <p>The Applicants have not committed to the simultaneous construction of the projects but they have provided a commitment within their Project Update Note submitted at Deadline 2 (REP2-007) that should both projects be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole onshore cable route in parallel with the installation of the onshore</p>	<p>Noted. No further comment.</p>



ID	ESC Comment	Applicants' Comments
	<p>cables for the first project. This commitment has also been secured through Requirement 42 of the draft DCOs (REP8-003).</p>	
3	<p><u>Permitted development rights should be removed as part of the DCOs to prevent the ability of National Grid, the Applicants or future site operators to extend the substations without the need for planning permission from the local planning authority.</u></p> <p>ESC and the Applicants disagree regarding the need to remove permitted development rights. ESC maintains the view and has set its position out at Deadline 8 (REP8-148) in response to the hearing action points from ISH15.</p>	<p>The Applicants do not accept that the National Grid substation could be extended without a consent/planning permission. It would be on land which was not operational land and would be integral to projects which were EIA development. The Applicants have illustrated the nature of the extensions.</p>
4	<p><u>The design of the National Grid substation should reflect its intended purpose as a strategic connection hub. The Councils consider that as a minimum, the CIA in the ESs should be updated to consider the known requirements in relation to the National Grid substation necessary to accommodate the connection offers that have been granted by NG-ESO.</u></p> <p>The Applicants have stated that the National Grid substation is only designed to accommodate the connections necessary for EA1N and EA2. National Grid has confirmed this. At Deadline 8, the Applicants provided EA1N and EA2 Extension of National Grid Substation Appraisal (REP8-074). This document provides some useful information but does not comprise a cumulative impact assessment. Further comments have been provided by ESC at Deadline 9 within the ESC's response to the information that the Applicants submitted at Deadline 8.</p> <p>ESC considers there is sufficient time available before the end of the examinations, given the three-month extension granted, should</p>	<p>Noted. The Applicants refer to their comments at ID29 within the previous table under section 2.1 of this document.</p>



ID	ESC Comment	Applicants' Comments
	<p>the Examining Authority determine that further assessment is necessary, for this to be provided.</p>	
Section 7 – Air Quality – Emissions and Dust - ESC Lead Authority		
5	<p><u>Justification for the decision to screen out re-routed traffic due to the road improvements at the A12/A1094 junction, A1094/B1069 junction and Marlesford Bridge from the air quality assessment.</u></p> <p>Satisfactory justification has been provided in relation to A12/A1094 junction, and A1094/B1069 junction.</p> <p>ESC understands that there is currently no confirmation of the works anticipated at Marlesford Bridge (Work No.37). As a result, the Outline Construction Traffic Management Plan (OCTMP, REP8-021) does not provide confirmation that risk of air quality impacts due to works in Work No.37 can be ruled out. ESC is still seeking confirmation of the nature of construction works in this area and the potential effects on traffic congestion/diversionary routes to enable a decision to be taken on whether there is a risk of significant adverse impacts on air quality. Alternatively, if this information cannot be provided, the OCTMP could be updated to provide a commitment that once further information is known the Applicants will consider the effects on air quality at this stage and if further assessment is necessary, this will be provided.</p>	<p>The Applicants signpost to the section 2.3 of their Summary of Oral Case Issue Specific Hearing 13 (REP8-098), which identifies the anticipated works to Marlesford Bridge in the event that the Port of Felixstowe is selected to serve as the construction port for the Projects. It should be noted that the duration (an anticipated period of two days) and extent of such works are unlikely to result in a significant air quality impact in relation to annual mean concentrations. As such, further assessment is not considered necessary.</p>
6	<p><u>Screening model calculation in relation to NRMM and the impact of emissions on ecological receptors. This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.</u></p>	<p>The Applicants note that the Outline CoCP (document reference 8.1) was updated at Deadline 8 with a commitment for Non-Road Mobile Machinery (NRMM) to comply with Stage IV emissions standards under EU Directive 97/68/EC or later, where possible.</p>



ID	ESC Comment	Applicants' Comments
	<p>The Applicants provided an Air Quality Clarification Note at Deadline 3 (REP3-061) which provided a quantitative assessment of Non-Road Mobile Machinery (NRMM). The assessment demonstrated that there is a risk of significant contributions to air pollution levels at designated habitat sites with Stage IV NRMM being utilised. This occurs in an area where Horizontal Direction Drilling (HDD) drilling is essential.</p> <p>The Applicants also provided an Onshore Ecology Clarification Note at Deadline 6 (REP6-025) which addresses this matter in Section 2.6. At the present time, Natural England has not provided a response to this further information. Whilst ESC defers to Natural England on matters relating to air quality impacts on statutory designated sites, ESC remains concerned that landfall construction could result in an adverse impact on part of the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). ESC refers to comments that it provided at Deadline 7 (REP7-063, paragraph 3.9 and 3.13) which provides further detail on this matter. Subject to any further advice from Natural England, ESC considers the detailed design of the projects should commit to all available mitigation measures to minimise this impact and appropriate monitoring should be carried during the construction phase to ensure that the conclusion presented by the Applicants is the outcome that occurs.</p>	<p>At Deadline 10, the Applicants have updated the Outline CoCP (document reference 8.1) with a commitment to discuss mitigation measures with the relevant planning authority during preparation of the final CoCP. The additional wording of the updated Outline CoCP specifies that, where specific mitigation measures proposed by the relevant planning authority are not deemed to be practicable, the rationale for this will be explained within the final CoCP. It follows that the final CoCP will include a rationale should the use of Stage IV NRMM for particular works not be practicable.</p> <p>The Outline CoCP has also been updated with the following commitment regarding the position of NRMM in relation to designated sites of nature conservation:</p> <p><i>Prior to construction, the Applicant will identify the positioning and orientation of plant and equipment involved with the landfall construction in consideration of sensitive air quality receptors where practicable. This will be undertaken with cognisance of the proximity of working areas in relation to the designated sites of nature conservation (i.e. Leiston – Aldeburgh SSSI).</i></p> <p>As such, the Applicants confirm that a consideration of both noise sensitive receptors and air quality impacts will inform the positioning and orientation of plant and equipment required for landfall construction. However, the Applicants are unable to make a firm commitment on restricting plant and equipment to certain areas within the Order limits within proximity to designated sites at this stage.</p> <p>Notwithstanding, the Applicants will consult with the relevant planning authority on the final suite of measures to be implemented during the preparation of the final CoCP post-consent and it is therefore acknowledged that the final CoCP may require additional measures in certain sensitive areas once these have been identified.</p> <p>Existing provisions within the Outline CoCP commit the Applicants to identifying higher-sensitivity areas (including consideration of soil types, proximity to the</p>



ID	ESC Comment	Applicants' Comments
		coast (with higher wind speeds) and positions of stockpiles) and implementing additional measures with regard to mitigating potential air quality impacts.
7	<p><u>Assessment of emissions from re-routed traffic, particular areas of concern for effects are Leiston, Saxmundham and Yoxford.</u></p> <p>The main area of risk with regard to the potential air quality effects of re-routed traffic is related to works which could affect traffic using the A12. These risks have been satisfactorily addressed in further clarification, with the exception of planned risks at Marlesford Bridge (Work No.37). ESC is still seeking confirmation of the nature of construction works in this area and the potential effects on traffic congestion/diversionary routes to enable a decision to be taken on whether there is a risk of significant adverse impacts on air quality or a commitment to undertake this work when more information is known within the OCTMP as stated previously.</p>	The Applicants refer to their comments at ID61 of the table in section 2.1 above.
8	<p><u>Assessment of the effects of emissions from haul road construction traffic on ecological receptors and human health.</u></p> <p>The Applicants provided an Air Quality Clarification Note at Deadline 1 (REP1-021) within which it was demonstrated that the additional light commercial vehicles and heavy goods vehicles along the haul roads would result in an insignificant impact upon air quality following Natural England's guidance. ESC advised that no further information was therefore required in relation to ecological receptors (REP2-029). Effective control of dust emissions from construction traffic using haul roads will remain an important component of the Code of Construction Practice (CoCP), as envisaged in Outline Code of Construction Practice (OCoCP) Section 10.1.2 and 10.1.5.</p>	The Applicants consider that the suite of measures set out within the IAQM guidance is already comprehensive and that the measures set out within the Outline CoCP (document reference 8.1) accord with this guidance. Existing provisions within the Outline CoCP commit the Applicants to identifying higher-sensitivity areas (including consideration of soil types, proximity to the coast (with higher wind speeds) and positions of stockpiles) and implementing additional measures with regard to mitigating potential air quality impacts.



ID	ESC Comment	Applicants' Comments
	<p>ESC also requests that the OCoCP should contain the following commitment which can be expanded on when finalising the CoCP post-consent: <i>"In view of the magnitude of earthworks, potentially dusty nature of materials, and coastal setting of construction activities, consideration will be given to specifying dust mitigation measures which go beyond those specified in the relevant IAQM guidance used in the Environmental Statement."</i></p>	
9	<p><u>Quantitative assessment of the cumulative impacts of EA1N and EA2 with Sizewell C.</u></p> <p>The Applicants provided a Clarification Note for Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) (REP2-009) which ESC provided a response to in REP4-059. The Applicants' commitment to ensuring that 70% of HGVs for the projects will comply with Euro VI standards in the event that the construction of the projects overlaps with Sizewell C construction has addressed this matter. This commitment is secured within the OCTMP (REP8-021) and OCoCP (REP8-017). ESC's evaluation indicates that this will be sufficient to ensure that there is no significant risk of adverse effects on health due to emissions to air from HGV traffic as a result of the proposed developments in combination with the proposed Sizewell C development, even at the most vulnerable locations close to the A12. Compliance with this requirement will be monitored as the construction programmes progress and details of the monitoring are secured within the OCTMP.</p>	Noted. No further comment.
10	<p><u>Submission of Outline Port Travel Plan detailing commitment that this will include an air quality assessment of port related traffic.</u></p> <p>The Applicants provided an updated Outline Port Construction Traffic Management and Travel Plan (OCTMP&TP) at Deadline 8</p>	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
	<p>(REP8-091). Within this document (paragraph 30) the Applicants commit to undertaking a screening exercise. Should this determine that an air quality assessment is required, the scope would be agreed with the highway authority and planning authorities and any assessment carried out in accordance with Institute of Air Quality Management Guidance Land-Use Planning and Development Control: Planning for Air Quality (2017), or any update to this guidance.</p>	
11	<p><u>Commitment to funding monitoring and mitigation measures, if required, in the Stratford St Andrew AQMA, including consideration of a construction action group.</u></p> <p>The Applicants have committed to ensuring that 70% of HGVs for the projects will comply with Euro VI standards in the event that the construction of the projects overlaps with Sizewell C construction. This commitment is secured within the OCTMP (REP8-021) and OCoCP (REP8- 017). ESC's evaluation indicates that this will be sufficient to ensure that there is no significant risk of adverse effects on health due to emissions to air from HGV traffic as a result of the proposed developments in combination with the proposed Sizewell C development, even at the most vulnerable locations close to the A12. Compliance with this requirement will be monitored as the construction programmes progress and details of the monitoring are secured within the OCTMP.</p> <p>The Applicants commitment to 70% of HGVs for the projects complying with Euro VI standards means that no further funding or mitigation measures are considered necessary.</p>	<p>Noted. No further comment.</p>
12	<p><u>Update the Outline CoCP in relation to measures to address dust nuisance and provide a commitment to and compliance monitoring</u></p>	<p>The Applicants consider that the suite of measures set out within the IAQM guidance is already comprehensive and that the measures set out within the</p>



ID	ESC Comment	Applicants' Comments
	<p><u>of Euro VI Standards for construction vehicles and Stage V for NRMM.</u></p> <ul style="list-style-type: none"> The OCoCP (REP8-017) has been updated and now provides a specific commitment to identify areas within the CoCP which are sensitive to dust impacts and provide comprehensive measures to address this. In addition, to reflect ESC's concerns about the risk of dust impacts, ESC is requesting that the OCoCP should contain the following commitment which can be expanded on when finalising the CoCP post-consent: <i>"In view of the magnitude of earthworks, potentially dusty nature of materials, and coastal setting of construction activities, consideration will be given to specifying dust mitigation measures which go beyond those specified in the relevant IAQM guidance used in the Environmental Statement."</i> The Applicants have committed to ensuring that 70% of HGVs for the projects will comply with Euro VI standards in the event that the construction of the projects overlaps with Sizewell C construction. This commitment is secured within the OCTMP (REP8-021) and OCoCP (REP8-017). ESC's evaluation indicates that this will be sufficient to ensure that there is no significant risk of adverse effects on health due to emissions to air from HGV traffic as a result of the proposed developments in combination with the proposed Sizewell C development, even at the most vulnerable locations close to the A12. Compliance with this requirement will be monitored as the construction programmes progress and details of the monitoring are secured within the OCTMP. The Applicants have confirmed within Section 10.1.6 of the OCoCP (REP8-017) that where possible all NRMM will comply with Stage IV emissions standards under EU Directive 97/68/EC or later. ESC is requesting an additional 	<p>Outline CoCP (document reference 8.1) accord with this guidance. Existing provisions within the Outline CoCP commit the Applicants to identifying higher-sensitivity areas (including consideration of soil types, proximity to the coast (with higher wind speeds) and positions of stockpiles) and implementing additional measures with regard to mitigating potential air quality impacts.</p> <p>Regarding emissions standards associated with heavy goods vehicles, the Applicants note agreement with ESC on this matter as supported by ESC's comment at ID61 in the table under section 2.1.</p> <p>The Applicants note that the Outline CoCP (document reference 8.1) was updated at Deadline 8 with a commitment for NRMM to comply with Stage IV emissions standards under EU Directive 97/68/EC or later, where possible. The Applicants are unable to commit to restricting movements of plant or siting of equipment in relation to its proximity to a designated site at this stage, until the detail design is undertaken. However, the Applicants recognise the sensitivity of the designated sites and will have regard to these features when considering the placement of equipment.</p>



ID	ESC Comment	Applicants' Comments
	<p>measure to ensure that any impacts from higher emitting plant are avoided, as follows: <i>"If Stage IV plant is not possible, ESC requests that the reasons for this should be provided to ESC, and any such plant should be deployed in locations as far away from sensitive receptors as practicable."</i></p>	
<p>Section 8 – External Lighting - ESC Lead Authority</p>		
13	<p>No actions identified.</p>	<p>No further comment.</p>
<p>Section 9 - Ecology and Ornithology - ESC Lead Authority</p>		
14	<p><u>Screening model calculation in relation to NRMM and the impact of emissions on ecological receptors. This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.</u></p> <p>The Applicants provided an Air Quality Clarification Note at Deadline 3 (REP3-061) which provided a quantitative assessment of NRMM. The assessment demonstrated that there is a risk of significant contributions to air pollution levels at designated habitat sites with Stage IV NRMM being utilised. This occurs in an area where HDD drilling is essential.</p> <p>The Applicants also provided an Onshore Ecology Clarification Note at Deadline 6 (REP6-025) which addresses this matter in Section 2.6. At the present time, Natural England has not provided a response to this further information. Whilst ESC defers to Natural England on matters relating to air quality impacts on statutory designated sites, ESC remains concerned that landfall construction could result in an adverse impact on part of the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). ESC refers to comments</p>	<p>The Applicants are cognisant of the sensitivity of the designated sites and will have regard to these features when considering the measures to be incorporated within the final CoCP prepared post-consent.</p>



ID	ESC Comment	Applicants' Comments
	<p>that it provided at Deadline 7 (REP7-063, paragraph 3.9 and 3.13) which provides further detail on this matter. Subject to any further advice from Natural England, ESC considers the detailed design of the projects should commit to all available mitigation measures to minimise this impact and appropriate monitoring should be carried during the construction phase to ensure that the conclusion presented by the Applicants is the outcome that occurs.</p>	
15	<p><u>Assessment of the effects of emissions from haul road construction traffic on ecological receptors.</u></p> <p>The Applicants provided an Air Quality Clarification Note at Deadline 1 (REP1-021) within which it was demonstrated that the additional light commercial vehicles and heavy goods vehicles along the haul roads would result in an insignificant impact upon air quality following Natural England's guidance. ESC advised that no further information was therefore required in relation to ecological receptors (REP2-029).</p>	Noted. No further comment.
16	<p><u>Assessment of cumulative effects of the construction works of EA1N and EA2 with Sizewell C on bats.</u></p> <p>The Applicants did not undertake a cumulative assessment in relation to the effects of the projects and Sizewell C on bats. However, as part of the Outline Landscape and Ecological Management Strategy (OLEMS, REP8-019) the Applicants have committed to additional construction and early operation measures to mitigate the impact of temporary hedgerow removal on foraging and commuting bats along the cable route. With the successful implementation of these additional measures ESC considers that cable route works will not result in a significant adverse impact on foraging and commuting bats and therefore there is unlikely to be</p>	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
	any significant cumulative impact in association with Sizewell C construction works.	
17	<p><u>Greater commitment to and assessment of the ecological enhancements provided by the projects.</u></p> <p>The Applicants provided an Ecological Enhancements Clarification Note at Deadline 1 (REP1- 035) and an addendum to the clarification note at Deadline 8 (REP8-041). ESC did not consider that the information provided at Deadline 1 adequately demonstrated that the projects could deliver ecological enhancement.</p> <p>The updated information provided in the Deadline 8 Addendum demonstrated the increases in habitat units that could be achieved, particularly at the substations site. Whilst delivery of genuine ecological enhancement will be reliant on good implementation and long-term management of the created habitats, it is acknowledged that the landscape planting at the substations site has the potential to also deliver some ecological enhancement when compared with the baseline condition. However, the degree to which these habitats will be used by more disturbance sensitive species (such as bats) is unknown and will depend on the final operational noise and light levels.</p>	Noted. The Applicants consider they have demonstrated that reasonable efforts have been and will be made to design and establish landscape planting and other habitats that will provide suitable habitat for wildlife.
18	<p><u>Requirement 15 of the draft DCOs to commit to a ten-year replacement planting period for replacement woodland rather than the five-year period currently proposed and provide for the maintenance period for the woodland and substation mitigation planting to the suspended or extended if the agreed objectives set out as part of the adaptive planting maintenance are not met.</u></p>	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
	<p>The OLEMS states in Section 4.2 that the Applicants will prepare and implement a Landscape Management Plan based upon an adaptive planting management scheme for trees and shrubs planted within Works No.s 19, 24, 29 and 33. A ten year period for the replacement of failed planting on a one-for-one basis has also been set out (paragraph 161, REP8-019).</p> <p>Requirement 15 of the draft DCOs secures the commitment for a ten year replacement period for failed planting within Work No.s 19, 24, 33 and 29.</p>	
19	<p><u>Requirement 21 of the draft DCOs should be updated to remove the reference to the survey results from the ES and updated to identify that the EMP will be based on up-to-date ecological survey work through the use of preconstruction surveys.</u></p> <p>Requirement 21(1) has been updated within the draft DCOs (REP8-003) to refer to the need for the EMP to take into consideration pre-commencement surveys.</p>	Noted. No further comment.
20	<p><u>OLEMS Update:</u></p> <ul style="list-style-type: none"> • <u>commitment to provide hurdles or similar links during construction to help maintain the commuting routes bats use for navigating through and across the site.</u> • <u>Commitment to provide measures to help maintain foraging areas bats use during construction.</u> • <u>Commitment to a ten-year maintenance period for the replacement woodland and provision of a management plan detailing how the woodland will be managed for the life of the infrastructure.</u> 	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
	<ul style="list-style-type: none"> • <u>Commitment to adaptive planting maintenance and aftercare for the replacement woodland and substation mitigation planting.</u> • The OLEMS (REP8-019) has been updated by the Applicants to include a commitment to provide hurdles during construction works (6.7.3.2) and retain the hurdles during the post construction phase (6.7.3.3) until the replacement hedgerow planting becomes established to maintain connectivity for commuting and foraging bats. • A ten-year period for the replacement of failed woodland planting on a one-for-one basis has been set out in the OLEMS (paragraph 161). Requirement 15 of the draft DCOs secures this commitment. The OLEMS (paragraph 169) also commits to the provision and agreement of a scheme with ESC regarding the precise measures to be implemented during the longer-term maintenance period. • The OLEMS states in Section 4.2 that the Applicants will prepare and implement a Landscape Management Plan based upon an adaptive planting management scheme for trees and shrubs planted within Works No.s 19, 24, 29 and 33. 	
Section 10 – Coastal Change – ESC Lead Authority		
21	<p><u>Inclusion of Outline Landfall Construction Method Statement (OLCMS) in the list of certified documents</u></p> <p>The draft DCOs (REP8-003) identify the OLCMS a certified document within Part 2 of Schedule 17.</p>	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
22	<p><u>Update wording of Requirement 13 to reflect that the LCMS should be in accordance with the Outline LCMS.</u></p> <p>The wording of Requirement 13(1)(a) of the draft DCOs (REP8-003) was updated to reflect the need for the Landfall Construction Method Statement to accord with the OLCMS.</p>	Noted. No further comment.
23	<p><u>Requirement 37 to be updated to include infrastructure associated with work no.6 up to the point of the mean low water mark.</u></p> <p>The wording of Requirement 13(1) and 13(1)(a) of the draft DCOs (REP8-003) was updated to reference Work No. 6 in addition to Work No.8.</p>	Noted. No further comment.
Section 12 – Built Heritage – ESC Lead Authority		
24	<p><u>Notwithstanding the Councils concerns regarding the significance of the impact on a number of the listed buildings at Friston, the Councils recognise that this is a difference of professional opinion which there is not likely to be further agreement on. The Councils however request that further work be undertaken by the Applicants in relation to the historic character of the landscape at Friston specifically considering the historic parish/Hundred boundary.</u></p> <p>The Applicants provided an Archaeology and Cultural Heritage Clarification Note (REP1-021) which sought to address the contribution the historic parish/Hundred boundary makes to the setting of Little Moor Farm and the Church in response to the concerns raised within the Local Impact Report (REP1-132). ESC responded in REP2-029 and confirmed that although professional disagreement remains regarding the extent to which the Hundred boundary contributes to the significance of Little Moor Farm, the</p>	Noted. No further comment.



ID	ESC Comment	Applicants' Comments
	document provided sufficient additional information and no further information was therefore considered necessary.	
25	<p><u>The Councils also request that the Applicants provide appropriate compensation in acknowledgement of the residual impacts caused by the projects on the heritage assets.</u></p> <p>The Applicants have committed to providing a sum of £200,000 per project within the signed s111 Agreements submitted at Deadline 8 (REP8-079) which will be used to contribute towards compensatory measures relating to the preservation and enhancement of heritage assets and their settings in Friston and its vicinity.</p>	Noted. No further comment.
Section 14 – Design and Masterplan - ESC Lead Authority		
26	<p><u>Update Outline Onshore Substation Design Principles Statement:</u></p> <ul style="list-style-type: none"> • <u>To include a Design Principles Statement for Nation Grid infrastructure</u> • <u>Commitment to make every effort to reduce the size and scale of the substations during post consent design refinement process.</u> • <u>Inclusion of details regarding the design process and engagement measures.</u> • The Applicants have provided a Substation Design Principles Statement (REP8-082) which includes the National Grid substation and infrastructure. Requirement 12(3) and (4) of the draft DCOs (REP8-003) prevents works on Work No. 38 or 41 commencing until details of the layout, scale and external appearance of the National Grid substation and cable sealing end compounds have been 	Noted. The Applicants consider this matter to be closed and have no further comment.



ID	ESC Comment	Applicants' Comments
	<p>submitted to and approved by ESC. 12(5) states that the details provided in relation to 12(3) and (4) must accord with the Design Principles Statement.</p> <ul style="list-style-type: none"> The Design Principles Statement was updated at Deadline 8 to include a new principle: "Reduction of visual impact of onshore substations, National Grid substation and cable sealing end compounds". <p>This new principle is considered to address ESC's request for a commitment in relation to making every effort to reduce the size and scale of the substations during the post consent design refinement work.</p> <ul style="list-style-type: none"> Appendix A of the Design Principles Statement relates to the engagement strategy the Applicants will adopt in relation to the design of the substations and cable sealing end compounds. 	
27	<p><u>Amendment to the wording of Requirement 12(6) in the draft DCOs to include the need for the design details of the National Grid infrastructure to comply with the Outline Onshore Substation Design Principles Statement relevant to this infrastructure.</u></p> <p>Requirement 12(3) and (4) of the draft DCOs (REP8-003) prevents works on Work No. 38 or 41 commencing until details of the layout, scale and external appearance of the National Grid substation and cable sealing end compounds have been submitted to and approved by ESC. 12(5) states that the details provided in relation to 12(3) and (4) must accord with the Substations Design Principles Statement. These revisions to the draft DCOs address the comments made within the Local Impact Report.</p>	Noted. The Applicants consider this matter to be closed and have no further comment.



ID	ESC Comment	Applicants' Comments
28	<p><u>Provision of an assessment of the use of a GIS National Grid substation.</u></p> <p>The Applicants have not provided this assessment, which should also include the consideration of alternatives to the use of sulphur hexafluoride (SF6). The Environmental Statements are based on the use of an Air Insulated Switchgear (AIS) National Grid substation. They have however shown what a Gas Insulated Switchgear (GIS) National Grid substation would look like visually within the submitted photomontages. The submission of these visualisations is useful and welcomed but without full assessment of the GIS option for the National Grid substation, it is not possible for ESC to fully compare the impacts of the two technologies and assess the degree to which one technology is beneficial over the other. The lack of a full assessment of the GIS option also limits the Examining Authority's ability to recommend to the Secretary of State that one technology should be favoured over another and prevents the ability for only the GIS option to be consented by the DCOs. The matter therefore remains outstanding.</p>	<p>The Applicants maintain that, on balance, they consider an AIS solution for the National Grid substation to be a worst-case scenario, given the area of the required footprint and associated spread of electrical equipment. As such, and in line with the Rochdale envelope approach to assessing potential environmental impacts, an assessment of landscape and visual effects has been undertaken based upon an AIS solution for the National Grid substation as presented within Chapter 29 of the ES (APP-077) and the Landscape and Visual Impact Assessment Addendum submitted at Deadline 4 (REP4-031).</p> <p>In recognition of the evolution of design commitments as detailed within the Substations Design Principles Statement (REP8-082), the Applicants intend to undertake an assessment of a GIS National Grid substation and will submit this at Deadline 11.</p>
29	<p><u>Exploration of the opportunity to consolidate and share infrastructure in association with the BEIS OTNR.</u></p> <p>The Applicants have stated that <i>'it is not envisaged that the review will lead to opportunities or outcomes which would be relevant to the delivery of the projects'</i>, the reasons for this position have been set out in their written summary of case for Issue Specific Hearing 2 (ISH2, REP3-085). Ofgem has also supported this view with their oral submission at ISH2 and further written submission provided at Deadline 4 (REP4-096).</p>	<p>The Substations Design Principles Statement (REP8-082) provides sufficient control and flexibility to ensure an appropriately designed onshore substation and National Grid substation is developed which meets each and every constraint and parameter set out within the DCO. In particular, the following design principles are noted:</p> <ul style="list-style-type: none"> • Reduction of visual impact of onshore substations, National Grid substation and cable sealing end compounds (i.e. where cost effective and efficient to do so, the Applicants will seek to further reduce the visual extent of the onshore substations, National Grid substation and



ID	ESC Comment	Applicants' Comments
	<p>To allow the potential for the design of the projects to adapt to the changing policy and technological environments, ESC supported SCC's suggested wording for an additional design principle which could be incorporated into the Design Principles Statement (REP5-082)</p> <p><i>The detailed design of the project and the procurement processes that support it, will both engage with, respond to, and in so far as practicable, adopt and adapt to, any new opportunities arising from emerging new technologies and changes to legislation and regulations, in order to minimise the harms to the receiving environment and maximise the benefits of the project through good design. Engagement with the opportunities that may be offered from emerging technological, regulatory, and legislative change is a fundamental principle, that will be applied at all times, during the design procurement and development process.</i></p> <p>Following further discussions with the Applicants, it has been confirmed that engagement in relation to the design of the substations and infrastructure has already started to occur and will continue. ESC has been advised by the Applicants that it is not anticipated that there would be a significant delay between the consent of the projects and their design, this is reflected within the timescales provided within the engagement set out in Appendix A of the Substation Design Principles Statement (REP8-082). Therefore although ESC would like to see this additional principle included within the Substation Design Principles Statement, it is accepted that this is not a matter upon which the Applicants and ESC are likely to agree and that if the Applicants proceed on the timeframe envisaged there is unlikely to be significant changes to available technologies, current policy or regulations. However, in the event of</p>	<p>cable sealing end compounds, through appropriate equipment procurement and layout considerations).</p> <ul style="list-style-type: none"> Operational equipment will be designed and installed to maintain low noise levels of no more than 31dBA at SSR2 and SSR5 (NEW) and 32dBA at SSR3. The Applicants will seek to minimise the operational noise rating level below the limits set out in Requirement 27 of the draft DCO (REP8-003) and avoid any perceptible tones and other acoustic features at any residential receptor that would attract a correction in accordance with BS4142:2014+A1:2019, insofar as these mitigation measures do not add unreasonable costs or delays to the Projects or otherwise result in adverse impacts on other aspects of the environment (e.g. landscape and visual impacts). Consider 'Good Design' in line with the requirements of Overarching National Policy Statement for Energy (NPS EN-1) and the National Infrastructure Commission's 'Design Principles for National Infrastructure' (National Infrastructure Commission, February 2020) <p>The visual impacts of the substation buildings will be minimised as far as possible by their sensitive placing, the use of appropriate design, building materials, shape, layout, coloration and finishes.</p>



ID	ESC Comment	Applicants' Comments
	<p>any project delays, the omission of the proposed principle could be potentially important, particularly given the rapidly changing policy and regulatory environment. It for this reason that the position that the proposed principle should be included is maintained.</p>	
30	<p><u>Acknowledgement of the known future projects with agreement from NG-ESO to connect to the grid at Friston, in the CIAs. These connections should be taken into account within the siting and design considerations of the proposed substations.</u></p> <p>The Applicants have stated that the National Grid substation is only designed to accommodate the connections necessary for EA1N and EA2. National Grid has confirmed this. At Deadline 8, the Applicants provided EA1N and EA2 Extension of National Grid Substation Appraisal (REP8-074). This document provides some useful information but does not comprise a cumulative impact assessment. Further comments have been provided by ESC at Deadline 9 within the Council's response to the information the Applicants information submitted at Deadline 8.</p> <p>ESC considers there is sufficient time available before the end of the examinations, given the three-month extension granted, should the Examining Authority determine that further assessment is necessary for this to be provided.</p>	<p>Noted. The Applicants refer to their comments at ID29 within the previous table under section 2.1 of this document.</p>
<p>Section 15 – Landscape and Visual Effects – ESC Lead Authority</p>		
31	<p><u>Provision of a clarification note on the historic landscape character and features taking into account the interplay between the different disciplines.</u></p>	<p>The Applicants note ESC's comment and refer back to their responses at ID74 and ID75 in the table within Appendix 1 of the Applicants' Comments on ESC's Deadline 4 Submissions (REP5-010). In summary, the Applicants consider the assessment of landscape effects within Chapter 29 of the ES (APP-077) to be of sufficient level of granularity to evaluate the landscape</p>



ID	ESC Comment	Applicants' Comments
	<p>The Applicants provided an Archaeology and Cultural Heritage Clarification Note at Deadline 1 (REP1-021) in order to address this point which ESC provided a joint response to with SCC at Deadline 2 (REP2-029). Although the clarification note was welcomed, the extent and significance of the harm to the site was not considered to be fully addressed as the assessment of landscape impacts only went as far as the landscape character type level as opposed to the site level. ESC and SCC suggested a way to address this, but this was not pursued by the Applicants. Further details are contained within the ESC's Deadline 2 response (REP2-029).</p>	<p>sensitivity and the likely significant effects of the Projects' onshore substations on the character of the receiving landscape.</p>
32	<p><u>Submission of updated visualisations illustrating a more realistic depiction of 15 years of planting growth.</u></p> <p>Updated visualisations were provided at Deadline 3 in addition to a clarification note (REP3-062, REP3-063, REP3-064, REP3-065, REP3-066, REP3-067 & REP3-068). ESC provided a response at Deadline 4 (REP4-059). In summary, ESC considered the depiction of 15 years planting was generally accepted as a more realistic portrayal of the mitigation planting. There remained some issues with the depiction of hedgerow standard trees, but these are minor and make little to no difference to the overall representation of the Applicants' claimed screening effects. The removal of advanced planting from the photomontages and the clarification note in this regard was noted and welcomed.</p>	<p>Noted. The Applicants consider this matter to be closed and have no further comment.</p>
33	<p><u>Commitment to the use of adaptive maintenance and aftercare in relation to the substations' mitigation planting and replacement woodland planting.</u></p> <p>The OLEMS states in Section 4.2 (REP8-019) that the Applicants will prepare and implement a Landscape Management Plan based</p>	<p>Noted. The Applicants consider this matter to be closed and have no further comment.</p>



ID	ESC Comment	Applicants' Comments
	upon an adaptive planting management scheme for trees and shrubs planted within Works No.s 19, 24, 29 and 33.	
34	<p><u>Commitment to the provision of strategic offsite planting and a fund to provide private planting to offset and compensate for the significant residual impacts identified in the ESs.</u></p> <p>The Applicants have committed to providing a sum of £355,000 within the signed s111 Agreements submitted at Deadline 8 (REP8-079) which will be used to contribute towards providing further landscape, environmental access and amenity improvements and enhancements to Friston and its vicinity. This compensatory fund can be utilised to provide strategic offsite planting as ESC requested within the Local Impact Report.</p>	Noted. The Applicants consider this matter to be closed and have no further comment.
35	<p><u>Commitment to provide details regarding the long-term management of the site which would be secured through the DCOs. This would involve the commitment to produce a long-term management plan and the commitment to establish of a community liaison group.</u></p> <p>The OLEMS (paragraph 169, REP8-019) commits to the provision and agreement of a scheme with ESC regarding the precise measures to be implemented during the longer-term maintenance period.</p> <p>The creation of a community liaison group for the operational phase of the development was discussed with the Applicants and an initial draft Terms of Reference for the group was jointly prepared by ESC and SCC and provided to the Applicants. A copy of this document has been provided in Appendix 1. This matter remains outstanding.</p>	The Applicants have engaged previously with ESC on this matter and previously confirmed that the establishment of a community liaison group (through the Terms of Reference) would be inappropriate and disproportionate for the operation phase of the Projects. The Applicants confirm that contact details for the substations will be available to the local communities during the operation phase, as is usually the case for operational substations of this nature.



ID	ESC Comment	Applicants' Comments
Section 16 – Seascape and Visual Effects		
36	<p><u>Update SLVIAs to consider impact of reduction of the maximum tip height</u></p> <p>The Applicants have not updated the Seascape, Landscape and Visual Impact Assessments (SLVIAs) following their design refinement and commitment to a turbine height no greater than 282m and therefore the extent of the reduction in impact as a result of this revision has not been identified.</p>	<p>The Applicants would note that they have reviewed the SLVIA regarding the design refinements and determined that while some magnitudes of change would reduce, these would not result in a reduction in significance of any assessed impacts.</p>
37	<p><u>Engage with Natural England regarding further modifications necessary</u></p> <p>Although engagement has taken place there remains professional disagreement between the parties.</p>	<p>Noted. No further comment.</p>
38	<p><u>The Councils will continue to engage with the Applicant for EA2 to seek appropriate compensation for the significant impacts identified as a result of the EA2 project.</u></p> <p>The Applicants have committed to providing a sum of £465,000 within the EA2 signed s111 Agreements submitted at Deadline 8 (REP8-079) which will be used for measures to support access, environmental and ecological enhancements to the Area of Outstanding Natural Beauty (AONB). ESC has requested that this fund be provided to compensate for the significant impacts identified on the AONB as a result of the offshore turbines of EA2.</p>	<p>Noted. No further comment.</p>
Section 17 – Land Use - ESC Lead Authority		
39	<p><u>Explore opportunities for great consolidation of infrastructure</u></p>	<p>The Substations Design Principles Statement (REP8-082) provides sufficient control and flexibility to ensure an appropriately designed onshore substation</p>



ID	ESC Comment	Applicants' Comments
	<p>The Applicants have stated that 'it is not envisaged that the review will lead to opportunities or outcomes which would be relevant to the delivery of the projects', the reasons for this position have been set out in their written summary of case for Issue Specific Hearing 2 (ISH2, REP3-085). Ofgem has also supported this view with their oral submission at ISH2 and further written submission provided at Deadline 4 (REP4-096).</p> <p>To allow the potential for the design of the projects to adapt to the changing policy and technological environments, ESC supported SCC's suggested wording for an additional design principle which could be incorporated into the Design Principles Statement (REP5-082)</p> <p><i>The detailed design of the project and the procurement processes that support it, will both engage with, respond to, and in so far as practicable, adopt and adapt to, any new opportunities arising from emerging new technologies and changes to legislation and regulations, in order to minimise the harms to the receiving environment and maximise the benefits of the project through good design. Engagement with the opportunities that may be offered from emerging technological, regulatory, and legislative change is a fundamental principle, that will be applied at all times, during the design procurement and development process.</i></p> <p>Following further discussions with the Applicants, it has been confirmed that engagement in relation to the design of the substations and infrastructure has already started to occur and will continue to do so. ESC has been advised by the Applicants that it is not anticipated that there would be a significant delay between the consent of the projects, if the Orders are made, and their design. This is reflected within the timescales provided within the</p>	<p>and National Grid substation is developed which meets each and every constraint and parameter set out within the DCO. In particular, the following design principles are noted:</p> <ul style="list-style-type: none"> • Reduction of visual impact of onshore substations, National Grid substation and cable sealing end compounds (i.e. where cost effective and efficient to do so, the Applicants will seek to further reduce the visual extent of the onshore substations, National Grid substation and cable sealing end compounds, through appropriate equipment procurement and layout considerations). • Operational equipment will be designed and installed to maintain low noise levels of no more than 31dBA at SSR2 and SSR5 (NEW) and 32dBA at SSR3. The Applicants will seek to minimise the operational noise rating level below the limits set out in Requirement 27 of the draft DCO (REP8-003) and avoid any perceptible tones and other acoustic features at any residential receptor that would attract a correction in accordance with BS4142:2014+A1:2019, insofar as these mitigation measures do not add unreasonable costs or delays to the Projects or otherwise result in adverse impacts on other aspects of the environment (e.g. landscape and visual impacts). • Consider 'Good Design' in line with the requirements of Overarching National Policy Statement for Energy (NPS EN-1) and the National Infrastructure Commission's 'Design Principles for National Infrastructure' (National Infrastructure Commission, February 2020) <p>The visual impacts of the substation buildings will be minimised as far as possible by their sensitive placing, the use of appropriate design, building materials, shape, layout, coloration and finishes.</p>



ID	ESC Comment	Applicants' Comments
	<p>engagement set out in Appendix A of the Substation Design Principles Statement (REP8-082). Therefore although ESC would like to see this additional principle included within the Substation Design Principles Statement, it is accepted that this is not a matter upon which the Applicants and ESC are likely to agree and that if the Applicants proceed on the timeframe envisaged there is unlikely to be significant changes to available technologies, current policy or regulations. However, in the event of any project delays, the omission of the proposed principle could be potentially important, particularly given the rapidly changing policy and regulatory environment. It for this reason that the position that the proposed principle should be included is maintained.</p>	
40	<p><u>Reduce the size and scale of the substations including a commitment to the use of a National Grid GIS</u></p> <p>The Applicants committed to a reduction in the footprint of the project substations from 190m by 190m to 170m by 190m. The Applicants also committed to reductions in the maximum heights of the EA1N and EA2 substation infrastructure. The reductions in the project substations have been reflected in updated maximum dimensions set out in Requirement 12 of the draft DCOs (REP8-003).</p> <p>ESC welcomes these reductions and requested that similar work was also undertaken pre-consent in relation to the National Grid substation. Although this was not undertaken, The Design Principles Statement (REP8-082) was updated at Deadline 8 to include a new principle:</p>	<p>Noted. The Applicants maintain that, on balance, they consider an AIS solution for the National Grid substation to be a worst-case scenario, given the area of the required footprint and associated spread of electrical equipment. As such, and in line with the Rochdale envelope approach to assessing potential environmental impacts, an assessment of landscape and visual effects has been undertaken based upon an AIS solution for the National Grid substation as presented within Chapter 29 of the ES (APP-077) and the Landscape and Visual Impact Assessment Addendum submitted at Deadline 4 (REP4-031).</p> <p>In recognition of the evolution of design commitments as detailed within the Substations Design Principles Statement (REP8-082), the Applicants intend to undertake an assessment of a GIS National Grid substation and will submit this at Deadline 11.</p>



ID	ESC Comment	Applicants' Comments
	<p>“Reduction of visual impact of onshore substations, National Grid substation and cable sealing end compounds”.</p> <p>This new principle is considered to address ESC’s request for a commitment in relation to making every effort to reduce the size and scale of the substations during the post consent design refinement work.</p> <p>The Applicants have not provided a commitment to utilise GIS technology for the National Grid substation, at present both options are available within the draft DCOs. ESC considers that a full assessment of the GIS National Grid substation impacts remains necessary. This would also include the consideration of alternatives to the use of SF6. This would therefore provide the ability for ESC, Interested Parties and the Examining Authority to compare the impacts of the AIS and GIS technological options and recommend that one technology proceeds over another.</p>	
41	<p><u>Provide greater coordination within the delivery of the projects</u></p> <p>The Applicants have not committed to the simultaneous construction of the projects but they have provided a commitment within their Project Update Note submitted at Deadline 2 (REP2-007) that should both projects be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole onshore cable route in parallel with the installation of the onshore cables for the first project. This commitment has also been secured through Requirement 42 of the draft DCOs (REP8-003).</p>	Noted. The Applicants consider this matter to be closed and have no further comment.
<p>Section 19 – Noise and Vibration - ESC Lead Authority</p>		



ID	ESC Comment	Applicants' Comments
<u>Construction Noise and Vibration</u>		
42	<p><u>Commitment that the “Construction Phase Noise Management Plan” described in the outline CoCP will be informed by an updated assessment of construction noise based on finalised construction proposals as and when they are available.</u></p> <p>The Applicants have committed within Section 9.1 of the OCoCP (REP8-017) for their contractors to seek and obtain consent(s) from ESC for the onshore works, as defined under Section 60 of the Control of Pollution Act 1974. The contractors will use Best Practicable Means to minimise construction noise as far as reasonable and practical to do so. The OCoCP (paragraph 100) also contains a commitment for the s61 applications to assess the noise impact from the construction noise using the ABC assessment method. The further assessment that ESC requested within the Local Impact Report will be part of the s61 application process.</p>	Noted. The Applicants consider this matter to be closed and have no further comment.
43	<p><u>Commitment to providing specific mitigation measures for the areas where the onshore Order Limits and hence construction works are in close proximity to residential properties. Locations include properties south of Sizewell Gap Road, Gypsy and Fitches Lane and immediately around the substations site in Friston.</u></p> <p>Sections 9.1.2 to 9.1.5 of the OCoCP (REP8-017) include specific commitments in relation to mitigation measures to be adopted at the locations identified within the joint Local Impact Report (REP1-132). Section 9.1.1 also includes some additional clarification regarding the core working hours and the activities which can occur within the shoulder hours either side of these hours. The Council welcomes</p>	Noted. The Applicants consider this matter to be closed and have no further comment.



ID	ESC Comment	Applicants' Comments
	<p>the efforts to address specific concerns relating to particularly sensitive receptors and construction locations and are satisfied that the final CoCP will provide an opportunity to ensure the final proposals are suitably robust.</p>	
44	<p><u>Commitment that proposals for construction noise monitoring will be included in the CoCP and would be agreed with the local planning authority.</u></p> <p>Section 9.2. of the OCoCP (REP8-017) presents the initial proposals for noise and/or vibration monitoring during construction. The Applicants have stated (paragraph 121) that a decision as to whether construction noise monitoring is required will be deferred to ESC. The s61 applications will include a detailed description of the monitoring and monitoring locations for particular works (paragraph 122).</p>	<p>Noted. The Applicants consider this matter to be closed and have no further comment.</p>
45	<p><u>Commitment that prior to undertaking any essential night-time working, the timing and duration of such works will be approved by ESC through an agreed process to be included in the CoCP, including consideration of the noise and vibration impact where appropriate.</u></p> <p>Requirements 23 and 24 of the draft DCOs supported by the contents of the OCoCP (REP8- 017) clearly set out the permitted hours of working. Requirements 23 and 24 identify that the Applicants will be required to seek the ESC's prior approval in relation to the duration and timing of any essential works which need to be undertaken outside the hours specified. In addition to this, Requirements 23 and 24 have also been updated to reflect the need for the Applicants to also obtain ESC's approval as to whether</p>	<p>Noted. The Applicants consider this matter to be closed and have no further comment.</p>



ID	ESC Comment	Applicants' Comments
	<p>"essential activities" outside categories (a) to (d) are essential. ESC welcomes this revision.</p>	
<p><u>Operational Noise</u></p>		
46	<p><u>Details of the layout and sizes of the difference noise sources modelled on both substations sites.</u></p> <p>The Applicants provided some additional information on the size and locations of the modelled noise sources at Deadline 4 in in a Clarification Note on Noise Modelling (REP4-043). ESC understands that this information will be refined and developed during the detailed design process, and the operational noise models re-run accordingly.</p>	Noted. No further comment.
47	<p><u>A break-down of the relative level of noise generated by the different sources at each receptor location.</u></p> <p>The Applicants provided a Clarification Note on Noise Modelling (REP4-043) which provided a short commentary on the dominant noise sources at each receptor but no break-down of predicted noise levels as requested. This information will presumably be provided within the pre-commencement Operational Noise Design Report for formal discharge by ESC.</p>	<p>The Applicants note that consideration of the most dominant noise sources with the respective predicted noise levels was provided within section 6.3 of the Noise Modelling Clarification Note (REP4-043). However, an analysis of the operational noise contributions for the noise-emitting plant will be undertaken as part of the preparation of the Operational Noise Design Report to inform targeted mitigation of the equipment insofar as these measures do not add unreasonable costs or delays to the Projects or otherwise result in adverse impacts on other aspects of the environment (e.g. landscape and visual impacts).</p>
48	<p><u>Clarification on whether the reported A-weighted or Octave band source data reported for operational noise sources have been used in the noise model.</u></p> <p>The Applicants Deadline 6 (REP6-026) submissions stated that:</p> <p><i>"The Applicants confirm that the linear (unweighted) spectral data presented within Table 5 of the Noise Modelling Clarification Note</i></p>	<p>The Applicants confirm that software used for modelling predicted noise levels calculates linear outputs from A-weighted inputs or vice versa, depending on the type of input data. It is therefore reiterated that the data has not been A-weighted twice, and only a single correction has been applied.</p>



ID	ESC Comment	Applicants' Comments
	<p><i>(REP4-043) were input into the noise model software before applying an A-weighting prior to modelling being undertaken."</i></p> <p>The data in Table 5 are reported in octave bands as pre A-weighted octave band levels (dB(A)) as opposed to linear unweighted octave band levels (dB). It is not clear if this is a typographical error. It is expected that this issue will need to be addressed in the pre-commencement Operational Noise Design Report for formal discharge by ESC.</p>	<p>However, the Applicants will remain cognisant of this during the preparation of the pre-commencement Operational Noise Design Report, secured via Requirement 12 of the draft DCO (document reference 3.1).</p>
49	<p><u>Results of noise modelling of National Grid substation</u></p> <p>The Applicants provided a Clarification Note on Noise Modelling (REP4-043) which included revised operational noise models, but the cumulative models did not include any contribution from the equipment on the National Grid substation. ESC provided comments in response in their Deadline 5 submission (REP5-048). Notwithstanding this disagreement between the Council and Applicants, Requirement 27 of the draft DCOs has been updated to include a combined rating level for the site incorporating the National Grid infrastructure.</p>	<p>The Applicants have continued to engage with National Grid Electricity Transmission (NGET) regarding the operational noise emissions expected from the plant proposed to comprise the National Grid substation. NGET provided the Applicants with technical specifications and the available data for their electrical equipment including switchgear, generators and overhead lines. The data provided to the Applicants was input into the operational noise model to establish the predicted noise levels at each of the receptors nearest to the onshore substation location (i.e. those specified within Requirement 27 of the draft DCO (document reference 3.1)) and the results provided within Section 4.3.1 of the Noise Modelling Clarification Note (REP4-043).</p> <p>The Applicants understand that the update to the wording of Requirement 27 which now secures a cumulative noise rating level with the simultaneous operation of the onshore substations and the National Grid substation overcomes ESC's concern.</p>
50	<p><u>1/3 Octave measurement data from existing substations to substantiate the position that operational noise is not expected to contain tonal elements.</u></p> <p>ESC maintains that the magnetostriction effects inherently associated with the proposed equipment mean that the operational</p>	<p>The Applicants note the difference in professional opinion regarding audible tones generated by the operation of the onshore substations, but understand that the updates to the wording of Requirement 12(2) of the draft DCO (document reference 3.1) and the Substation Design Principles Statement</p>



ID	ESC Comment	Applicants' Comments
	<p>noise limits should be subject to a +6 dB feature correction for tonality unless there is 1/3 Octave tonality analysis to confirm otherwise. The Applicants have not provided the 1/3 Octave measurement data. This remains an area of disagreement between the Applicants and ESC. However, Requirement 12(2) of the draft DCOs and the commitments provided within the Substation Design Principles Statement (REP8-082) will ensure that the detailed substation design requires formal approval from ESC and therefore this matter will be addressed.</p>	<p>(REP8-082) at Deadline 8 address ESC's concerns. Therefore, the Applicants have no further comment to add on this matter.</p>
51	<p><u>Confirmation of whether the effect of air humidity on corona discharge noise from existing power transmission lines was considered during the noise survey data analysis process.</u></p> <p>The Applicants confirmed within Section 3.2 of the Noise Modelling Clarification Note provided at Deadline 4 (REP4-043) that humidity was not considered within the Environmental Statements. It therefore remains unclear to what extent noise from existing power lines affected the noise levels measured by the Applicants and whether the noise survey data collected by the Applicants is representative of normal conditions. This is one of the reasons that ESC does not agree with the representative noise levels presented by the Applicants.</p>	<p>The Applicants refer back to their comments made under section 2 of Table 1 in the Applicants Comments on Local Impact Reports (REP3-071).</p> <p>Consultation with National Grid Electricity Transmission since submission of the Applications has identified that corona discharge noise from overhead transmission lines occurs only under very specific meteorological conditions, including (but not limited to) periods of high humidity or damp or drizzly weather. Damp and drizzly weather would have been recorded by the in-situ weather station. Any baseline noise survey measurements recorded during such periods would have fallen outside the scope of suitable weather conditions (as described in BS4142:2014 +A1:2019 and BS7445:2003) and been omitted from analysis of the baseline noise data to derive the background noise level.</p> <p>A review of the weather data collected during the baseline noise survey indicated a wide variation in humidity. It is notable that there is no set range of humidity levels over which corona discharge occurs so increased humidity is not an indication that corona noise would occur. If corona discharge was a feature of the measured baseline noise levels, there would be indication in the measured baseline noise data such as small fluctuations within the profile limited over a small dB range. This pattern is not observed within the profile of baseline noise measurements.</p>



ID	ESC Comment	Applicants' Comments
52	<p><u>Reconsideration of the identified background level for the site.</u></p> <p>The Applicants and ESC maintain a professional disagreement in relation to the background sound levels identified for the site. Notwithstanding this, the Applicants and ESC have reached agreement in relation to Requirement 27 which controls the combined rating level for the site.</p>	<p>Noted. The Applicants are pleased to have reached agreement on the control of operational noise with ESC.</p>
53	<p><u>Assessment of the effect of operational noises on the amenity and character of the areas that these sounds would be introduced into.</u></p> <p>The Applicants provided a Clarification Note on Noise Modelling at Deadline 4 (REP4-043) which included within Section 5 an assessment of non-residential amenity. ESC welcomed the assessment of the impact of noise on public rights of way around the substation site (REP5- 048).</p>	<p>Noted. The Applicants consider this matter closed and have no further comments.</p>
54	<p><u>Assessment of the impact of operational noise on ecological receptors.</u></p> <p>The Applicants provided an Onshore Ecology Clarification Note (REP4-005) which considered the impact of the operational noise on ecological receptors. ESC provided a response at Deadline 5 (REP5-048). The Council raised a number of concerns including the conclusion that Brown long-eared bats are absent from the substation area, the lack of demonstration that there is an ultra-sonic component to the noise generated by the substations in the operational phase and the exclusion of the National Grid substation from the assessment.</p> <p>ESC considers that given the uncertainties with the assessment provided, there is potential that the operational noise from the</p>	<p>The Applicants note that pre-construction surveys for bats will be undertaken throughout the onshore development area. Such surveys will seek to establish the presence or absence of any species of bat (including the Brown long-eared species). The results of these surveys will inform the measures set out within the EMP and also be taken into consideration within the Operational Noise Design Report, which must be submitted to and approved by the relevant planning authority prior to commencement of Work No. 30.</p>



ID	ESC Comment	Applicants' Comments
	<p>substations could have an adverse impact on bat species given that there are habitats suitable for them around the substations site and that further suitable habitats are to be created as part of the development. This matter remains outstanding.</p>	
55	<p><u>Further consideration should be given to noise mitigation options which could be utilised.</u></p> <p>Although details of noise mitigation measures have not been provided to ESC, it is acknowledged that the Applicants have given consideration to such measures by virtue of the reduction of the operational noise rating level. Further information in relation to this matter would be welcomed, this will however be a matter of ongoing engagement during the post consent design refinement phase.</p>	<p>The Applicants note that the update to the wording of Requirement 12(2) of the draft DCO (document reference 3.1) submitted at Deadline 8 secures the approval by ESC of the final operational noise mitigation measures to be implemented (which will form part of the Operational Noise Design Report, which must be submitted to and approved by the relevant planning authority prior to commencement of Work No. 30).</p>
56	<p><u>Amendment to the wording of Requirements 26 and 27 to set the noise limit at or below background levels and to include an additional monitoring receptor to the north of the site.</u></p> <p>Since the drafting of the Local Impact Report, Requirement 26 has been removed and Requirement 27 of the draft DCOs has been amended to provide an operational noise rating limit for the site which includes the project substations and National Grid substations and infrastructure. The cumulative operational rating level has also been reduced from 34dB LAeq to:</p> <p>(a) 32dB LAeq (15 min) at any time at a free field location immediately adjacent to the following noise sensitive locations—</p> <p>(i) 1 Woodside Cottages, Grove Road (641837, 261172);</p> <p>(ii) Woodside Barn Cottages, Church Road (641237, 260645);</p>	<p>Noted. The Applicants are pleased to have reached agreement on the control of operational noise with ESC through updates to the wording of the relevant Requirements in the draft DCO (document reference 3.1) and the Substations Design Principles Statement (REP8-082).</p>



ID	ESC Comment	Applicants' Comments
	<p>(b) 31dB LAeq (15 min) at any time at a free field location immediately adjacent to the following noise sensitive location—</p> <p>(i) Little Moor Farm, Knodishall (641228, 261676)</p> <p>The Applicants have confirmed to ESC that the rating level provided within Requirement 27 is the lowest possible at present based on their engagement with the supply chain. A commitment within Requirement 12(2) of the draft DCOs to provide details of the plant and any noise mitigation proposed for Work No.30 including any updated modelling for approval by ESC. Requirement 12(5) also states that any details pursuant to 12(2) must accord with the Substations Design Principles Statement (REP8-082) which has been updated to include a new principle. This new principle commits the Applicants to seek to minimise the operational noise rating level below the limits set in Requirement 27 and avoid perceptible tones and other acoustic features at any residential receptors in so far these measures do no add unreasonable costs or delays, to the projects or otherwise result in adverse impact on other aspects of the environment.</p> <p>Requirement 27 has therefore been updated to include the additional noise monitoring location and although the rating levels proposed are not currently set at background levels, the Council will work with the Applicants, if the projects are consented, to seek to minimise the operational noise rating level further.</p>	
Section 20 – Socio-Economics – ESC Lead Authority for Tourism		
57	<p><u>Provision of a tourism fund</u></p> <p>The Applicants have committed to providing £150,000 to be paid to Suffolk Community Foundation. The sum will be used to market the</p>	Noted. No further comment.

Applicants' Comments on ESC's Deadline 9 Submissions

6th May 2021



ID	ESC Comment	Applicants' Comments
	locality during the construction period to address the concerns raised by ESC regarding the negative impact on visitor perceptions which would result from the projects, in addition to cumulatively with the construction of Sizewell C.	