



**Application by East Anglia ONE North Ltd for East Anglia ONE North Offshore Wind Farm  
Application by East Anglia TWO Ltd for East Anglia TWO Offshore Wind Farm**

**The Examining Authorities' written questions and requests for information (ExQs3)**

**Issued on 20 May 2021**

The following table sets out the Examining Authorities' (ExAs') written questions and requests for information – ExQs3. Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annexes C to the Rule 6 letters of 21 February 2020 and 16 July 2020. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of each application against relevant policies. The Table of Contents on page 4 of this document lists the framework headings used and hyperlinks to each heading. This ExQs document is a parallel document applicable to both Examinations. Each individual question indicates the Examination(s) it is applicable to as follows.

- 1** A yellow icon with a black **1**: the question is applicable to the East Anglia ONE North Examination.
- 2** A blue icon with a white **2**: the question is applicable to the East Anglia TWO Examination.
- 1 2** Both icons: the question is applicable to both Examinations.

Column 2 of the table indicates which Interested Parties (IPs) and Other Persons each question is directed to. The ExAs would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with a number (indicating that it is from an ExQs round of that number) and then has an issue number and a question number. For example, the first question on Aviation in this round of questions is identified as ExQ3.1.1. When you are answering a question, please start your answer by quoting the unique reference number. If you need to distinguish your response as applying only to East Anglia ONE North you can add **(1)** to the end of the reference (ExQ3.1.1**(1)**) and if you need to distinguish your response as applying only to East Anglia TWO you can add **(2)** (ExQ3.1.1**(2)**).

If your responses uniquely relate to one of the two Examinations, you should send your response to the mailbox for that individual Examination. However, if any of your responses contain material that relates to both Examinations, you should copy them to both Examination mailboxes, as a copy will be published in both Examination Libraries.

If you are responding to a small number of questions, answers in an email or a letter will suffice. If you are answering a larger number of questions, it will assist the ExAs if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the Case Teams. Please contact the following email addresses and include 'East Anglia OWFs ExQs3' in the subject line of your email:

[EastAngliaOneNorth@planninginspectorate.gov.uk](mailto:EastAngliaOneNorth@planninginspectorate.gov.uk) and/ or [EastAngliaTwo@planninginspectorate.gov.uk](mailto:EastAngliaTwo@planninginspectorate.gov.uk).

Responses are due by **Deadline 11 in both Examinations: 7 June 2021**

### Abbreviations used

PA2008	The Planning Act 2008	NPS(s)	National Policy Statement(s)
AONB Board	Suffolk Coast & Heaths Area of Outstanding Natural Beauty Partnership	NSIP(s)	Nationally Significant Infrastructure Project(s)
Art(s)	Article(s) (in a DCO)	NPPF	National Planning Policy Framework
BoR(s)	Book(s) of Reference	OFH(s)	Open Floor Hearing(s)
CA	Compulsory Acquisition	R(s)	Requirement(s) (in a DCO)
CAH(s)	Compulsory Acquisition Hearing(s)	RR(s)	Relevant Representation(s)
(d)DCO(s)	(Draft) Development Consent Order(s)	SASES	Substation Action Save East Sussex
EM	Explanatory Memorandum(a)	SEAS	Suffolk Energy Action Solutions
EA1N	East Anglia ONE North	SCC	Suffolk County Council
EA2	East Anglia TWO	SoCG(s)	Statement(s) of Common Ground
ES	Environmental Statement(s)	SoS	Secretary of State
ESC	East Suffolk Council	SourS	Save our Sandlings
ExA(s)	Examining authority(ies)	SPA	Special Protection Area
FRA	Flood Risk Assessment	SSSI	Site of Special Scientific Interest
ISH(s)	Issue Specific Hearing(s)	TP	Temporary Possession
LIR(s)	Local Impact Report(s)	WR(s)	Written Representation(s)
LPA(s)	Local planning authority(ies)		

## The Examination Libraries

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the Examination Libraries. The Libraries have been catalogued so that documents that are parallel documents in the Examination Libraries for East Anglia ONE North and East Anglia TWO both share the same reference number. Where a document is unique to one Examination, the reference number will only be used in that Examination Library. The same number in the other Examination Library will be marked as 'reference not in use'. The Examination Libraries can be obtained from the following links:

- East Anglia ONE North  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001607EA1N%20Examination%20Library%20PDF%20Version.pdf>
- East Anglia TWO  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-001676East%20Anglia%20Two%20Examination%20Library.pdf>

The Examination Libraries will be updated as the examinations progress.

## Citation of Questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number: project reference (if required)

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ExQs <b>3</b>		Question to:	Question:
<b>3.0</b>	<b>Overarching, general and cross-topic questions</b>		
3.0.1	East Suffolk Council, Suffolk County Council, Suffolk Coasts and Heaths AONB, New Anglia LEP, MMO.	<b>1</b>	<b>2</b> <b>Plans and strategies</b> Please submit copies of the following documents to the examinations. You are only requested to submit those documents for which you are the owner/author. Full documents in PDF format are requested. <ul style="list-style-type: none"> <li>a) Suffolk County Council             <ul style="list-style-type: none"> <li>a. Local Transport Plan 2011 – 2031;</li> <li>b. Suffolk Green Access Strategy (Rights of Way Improvement Plan);</li> <li>c. Suffolk Minerals and Waste Local Plan 2020.</li> </ul> </li> <li>b) East Suffolk Council             <ul style="list-style-type: none"> <li>a. East Suffolk Strategic Plan 2020 - 2024;</li> <li>b. East Suffolk Economic Growth Plan 2018-2023;</li> <li>c. Suffolk Coastal Local Plan 2020;</li> <li>d. If any policies in the Waveney Local Plan 2019 are considered to be important and relevant then please submit it also;</li> <li>e. The made Leiston Neighbourhood Plan (2017);</li> <li>f. A description of progress on and latest drafts (if available) of the Aldringham cum Thorpe, Saxmundham, and Kelsale cum Carlton Neighbourhood Plans and any other Neighbourhood Plan(s) considered likely to have important and relevant content.</li> </ul> </li> <li>c) Suffolk Coast and Heaths AONB             <ul style="list-style-type: none"> <li>a. Suffolk Coast and Heaths AONB – Natural Beauty and Special Qualities Indicators document;</li> <li>b. Suffolk Coast and Heaths AONB Management Plan 2018-2023;</li> </ul> </li> </ul>

ExQs <b>3</b>	Question to:		Question:
			d) New Anglia LEP a. Economic Strategy for Norfolk and Suffolk 2017; b. New Anglia Local Industrial Strategy; e) MMO a. Suffolk Shoreline Management Plan 7, 2012; b. East Inshore and East Offshore Marine Plans.
3.0.2	The Applicants, East Suffolk Council	<b>1</b>	<b>2</b> <b>Section 111 Agreement</b> The ExAs note that East Suffolk Council states in its response to ExQ2.0.5 [REP6-079] that the s111 Agreements will secure funding in order to provide compensatory measures to help address the residual adverse impacts identified within the ESs, but that the Council itself <i>“notes that the Applicants will not be asking the Examining Authority to attach weight to this compensation in its decision-making”</i> , even though the Council themselves have moved to a predominantly neutral position on the overall balance of adverse impacts against benefits, partly by taking <i>“into account the compensation secured in the agreements”</i> .  Compensation sums that are not secured in the dDCO or accompanying certified documents or in another appropriate and enforceable instrument cannot be accorded weight and may not be able to be taken into account by the ExAs when considering their recommendations.  <u>To the Applicants:</u> a) Do you agree with the Council’s statement that <i>“the Applicants will not be asking the Examining Authority to attach weight to this compensation [the S111 Agreements] in its decision-making”</i> ?  <u>To the Council:</u>

ExQs <b>3</b>	Question to:		Question:
			b) Why has the Council moved to this position when the s111 Agreements do not seek to secure mitigation in relation to specific impacts? c) In circumstances where s111 Agreements do not secure benefits that should (in the Council's view) be weighed in the Planning Balance, is the Council content with a position in which no weight can be ascribed to any mitigation measure provided by or to any broader community benefit emerging from these agreements?
<b>3.1.</b>	<b>Aviation</b>		
3.1.1.	The Applicants, NATS	<b>1</b> <b>2</b>	<b>Civil Aviation</b> The Applicants' Topic Position Statements [REP9-009] state that NATS agreement to the wording of Requirement 35 of the dDCO is reliant on a commercial side agreement to be agreed. The document states that the aim was to complete this agreement and an associated SoCG by Deadline 11. a) Provide a further update on the position relation to the Commercial Side Agreement and associated SoCG. Should this not be completed by D11 can the Applicants and NATS confirm that a side agreement will be completed and evidence of completion submitted into the Examination before it closes, and if this is not going to happen then what is the proposed solution?

ExQs <b>3</b>		Question to:	Question:
3.2.	<b>Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))</b>		
Offshore ornithology			
3.2.1.	Natural England and the Applicants	<b>1</b>	<p><b>2 Red-throated diver (RTD) displacement</b>            With regard to RTD displacement, on page 36 of [REP10-017], the Applicants state that "... <i>the in-combination assessment is already over-precautionary...</i>".</p> <p>a) <u>To the Applicants</u>: Drawing together the evidence from your previous submissions, please provide a summary of your reasoning to justify this statement.</p> <p>The Applicants' argument in relation to the potential displacement effects on RTD is predicated upon its contention that the SPA population is at worst, not declining and at best, may be increasing.</p> <p>b) How confident are you that this statement is robust, given improvements in survey techniques?</p> <p>c) Should future surveys using digital surveying techniques indicate that the SPA population was declining then how would this be accounted for in the mitigation and the compensation measures that you are proposing?</p> <p>d) Does <u>Natural England</u> have any comments on (b) and (c)?</p>
3.2.2.	The Applicants		<p><b>2 RTD displacement: East Anglia TWO in-combination effects</b>            Notwithstanding your comments on page 36 of [REP10-017], for the sake of completeness please could the Applicants please provide the</p>



ExQs <b>3</b>			
	Question to:		Question:
			modelling outputs with the worst-case (i.e. Natural England's mortality assumptions) East Anglia TWO contribution towards RTD displacement included in the in-combination assessment.
3.2.3.	Natural England	<b>1</b>	<p><b>2</b> <b>Legal submissions: RTD displacement – 'effective habitat loss'</b>            In [REP10-017], the Applicants contend that recorded densities of red-throated diver (RTD) vary within the Outer Thames Estuary (OTE) SPA and that to treat all parts of the SPA as being of equal importance for the species is not appropriate. They state that, <i>"the areas of the SPA within the potential zone of influence of the windfarms have consistently recorded lower densities of birds and this is a material factor in considering the magnitude of potential impact"</i>.</p> <p>Does Natural England accept this line of reasoning? If not, please explain your reasons.</p>
3.2.4.	Natural England	<b>1</b>	<p><b>2</b> <b>Legal submissions: RTD displacement – 'effective habitat loss'</b>            In REP9-064, Natural England accepts that exclusion effects can be seen as a continuum of severity and states that <i>"the Bagmoor Wind case appears to have been a severe case"</i>. The Applicants [REP10-017] submit that in the Bagmoor Wind case, there was a concluded ecological consequence (i.e. that the territory was likely to be abandoned resulting in a potential increase in disturbance), whereas for EA1N and EA2, the displacement of RTD would have effects that are too small to detect.</p> <p>a) How does Natural England respond to this position?            b) In light of what we understand to be the magnitude of displacement effects on RTD of the OTE SPA in the case of the EA1N and EA2 projects, where does Natural England consider that the projects sit</p>

ExQs <b>3</b>			
Question to:	Question:		
			on the continuum of severity of ecological consequence in terms of potential exclusion effects?
3.2.5.	Royal Society for the Protection of Birds (RSPB)	<b>1</b>	<b>2</b> <b>Cumulative and in-combination collision risk: Hornsea Project Three contribution</b> In [REP8-171], the RSPB states that it does not agree with the Applicants that the in-combination annual kittiwake collisions apportioned to the FFC SPA should exclude the estimated collisions at Hornsea Project Three because the adverse effect arising from Hornsea Project Three will not be avoided and because it considers the effectiveness of the Hornsea Project Three compensatory measures to be " <i>highly uncertain</i> ". Conversely, Natural England [REP8-166, answer to R17QB.12] agrees with the Applicants' approach, stating that the SoS decision is clear that the impacts from Hornsea Project Three will be fully compensated for.  a) Does the RSPB maintain the view expressed in [REP8-171]? If so, please could you elaborate on the reasons for your position? b) Specifically, whilst noting your position that the collision risk impacts from Hornsea Project Three will not be avoided, if the H3 collision risk impact on kittiwake is fully compensated for, please explain why you consider it to be appropriate to include that impact in the in-combination and cumulative assessments?
3.2.6.	The Applicants and Natural England	<b>1</b>	<b>2</b> <b>Cumulative and in-combination collision risk: Flamborough and Filey Coast SPA</b> Paragraph 5 of the letter dated 28 April 2021 from Gareth Leigh of BEIS

ExQs <b>3</b>	Question to:		Question:
			<p>to Norfolk Boreas Limited (NBL)<sup>1</sup> requests that NBL in collaboration with Natural England provides updated in-combination assessments for collision and/or displacement effects at Flamborough and Filey Coast SPA, with and without Hornsea Project Four Offshore Wind Farm, using Natural England’s advised assessment parameters and the latest project parameters and baseline ornithology survey data for Hornsea Project Three Offshore Wind Farm. That information is requested by 28 May 2021.</p> <p>Since the in-combination totals used for EA1N and EA2 are derived from figures agreed at D8 of the Norfolk Vanguard examination, what do the Applicants and Natural England consider to be the implications (if any) of those updated in-combination assessments for the EA1N and EA2 examinations?</p>
3.2.7.	The Applicants	<b>1</b>	<p><b>HRA Derogation Case: Alternatives Assessment</b></p> <p>The ExA is not satisfied that the indicative array area layout plans submitted as Figure 1 in [REP6-044] and [REP8-088] provide an adequate response to ExQ2.2.5 [PD-030] and questioning at ISH14. This has particular importance for the consideration of EA1N effects, where Natural England has argued that increasing the buffer between the array area and the OTE SPA boundary should be considered as a suitable project-level alternative solution. In the absence of an agreed position with Natural England and other IPs, the ExA seeks the presentation of the following material to inform its consideration of the project’s HRA derogation case.</p>

<sup>1</sup> Available here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-002810-NORB-Secretary-of-State-letter.pdf>

ExQs <b>3</b>	Question to:	Question:
		<p>a) Please update [REP8-088] to include an indicative layout plan that shows the minimum inter-turbine spacing requirements specified within the offshore parameters of the dDCO (1200m x 800m) and which shows the siting of structures in the eastern part of the array area. On that plan, please indicate the distance between the closest of the WTGs and the boundary of the OTE SPA.</p> <p>b) If you wish to retain the plan currently presented in [REP8-088] (in addition to, and not instead of, the plan requested under part (a) of this question), then please justify the spacing distances presented and explain why you consider that a spacing arrangement more akin to the minimum spacing requirements could not realistically, in practice, be provided.</p> <p>c) Please also update the layout plan to ensure the key shows which is the purple solid line and which is the purple dashed line for the respective EA3 export cables. Please supplement the supporting text to explain why it is necessary to allow for both a preliminary and alternate export cable for EA3 and clarify why four structures are depicted within one of the cable exclusion zones.</p> <p>d) In section A.1.2.2 of [REP8-088] you refer to the Ulysses 2 cable and the EA3 export cables crossing the EA1N site and indicate that an exclusion zone of 500m on either side of each cable is required. However, in Figure 1 of the same document you indicate a cable exclusion zone of 750m. Please explain why these two greyed out zones in Figure 1 are 750m rather than 1,000m wide, or alternatively, amend the plan at Figure 1 to reserve cable exclusion zones that are 1,000m in width.</p>

ExQs <b>3</b>	Question to:		Question:
3.2.8.	The Applicants, Natural England, RSPB	<b>1</b> <b>2</b>	<p><b>Without prejudice compensation measures [REP8-089]: level of detail in relation to implementation</b></p> <p>Natural England expresses a view [REP9-065] that greater detail about the design and implementation of compensatory measures is needed to provide the SoS with the necessary confidence that those measures can be secured. This is a position echoed strongly by the RSPB [REP10-054, REP9-071]. The Applicants maintain the position [REP10-017, REP10-018, REP9-016] that compensation measures are appropriately secured and provide adequate levels of compensation, whilst providing necessary flexibility to allow for refinements in detail in the post-consent period.</p> <p>The ExAs note that publicly available correspondence<sup>2</sup> from the Secretary of State in relation to the decision stage for the Norfolk Boreas application requests additional environmental information with regard to possible HRA compensatory measures. This includes, for example, “<i>confirmation of the selected site(s) for compensation strategies and details of how the site(s) will be acquired/leased</i>”, as well as “<i>an implementation timetable for when the compensation measures will be delivered and achieve their objectives in relation to the first operation of the wind farm</i>”.</p> <p>a) In light of these requests, do the Applicants maintain their position that sufficient detail about the delivery of its without prejudice compensation measures has been submitted into this examination to enable the Secretary of State to discharge its duties as Competent</p>

<sup>2</sup> Letter dated 28 April 2021 from Gareth Leigh of the Department for Business, Energy and Industrial Strategy to Borfolk Boreas Ltd and others, available here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-002810-NORB-Secretary-of-State-letter.pdf>

ExQs <b>3</b>	Question to:		Question:
			<p>Authority without the need for further consultation in the decision stage?</p> <p>b) Does Natural England or RSPB have any observations to make on this question? If you consider that additional detail on the implementation of compensation measures is necessary, please set out the main areas in which you consider detail to currently be lacking.</p>
3.2.9.	Natural England	<b>1</b>	<p><b>2 Without prejudice compensation measures [REP8-089]: kittiwake feature of the Flamborough and Filey Coast (FFC) SPA</b></p> <p>Specifically, in relation to the proposed compensation measure for the kittiwake feature of the FFC SPA, Natural England states that [REP9-065], “<i>greater detail regarding the design and implementation of the artificial nest sites are needed</i>”.</p> <p>Please can Natural England elaborate on this by being more specific about what further information the Applicants could provide that might assuage your concerns. Please explain why this information is required prior to decision as opposed to as a possible submission of detail for approval post consent.</p>
3.2.10.	The Applicants	<b>1</b>	<p><b>2 Without prejudice compensation measures [REP8-089]: information about selected locations</b></p> <p>Natural England [REP10-053] advises that article 3(a) of Schedule 18 Parts 1-4 and 6 of the draft DCO [AS-110] should be amended to require that the information to be submitted includes justification for the selected location in terms of its ecological appropriateness.</p> <p>Please could the Applicants respond to this advice?</p>

ExQs <b>3</b>	Question to:		Question:
3.2.11.	Natural England, the Applicants	<b>1</b> <b>2</b>	<p><b>Without prejudice compensation measures [REP8-089]: timing of implementation</b></p> <p>Natural England has repeatedly expressed a view [REP9-069, REP8-163] that compensatory measures must be fully functioning and effectively compensating prior to construction/operation. The Applicants accept [REP9-016, REP10-017] that for some species subject to collision risk, there would be a time lag between the compensation measures being put in place and those measures resulting in additional birds within an SPA population, but have maintained that the resulting 'mortality debt' would be extremely small and could be recouped within one or two years of the measures becoming operational. The Applicants make the case that an approach akin to that within the made DCO for Hornsea Project Three, in which a lead-in period of four full breeding seasons is specified, would not be proportionate or justified in this case due to the much smaller numbers of birds that would need to be compensated for.</p> <p>a) <u>To Natural England</u> - do you accept the Applicants' reasoning on pages 49-50 of [REP10-017] that for displacement effects, in all cases the compensation measures would have immediate effect (i.e. removing predation mortality or preventing displacement effect at source) and therefore that any 'time lag' concerns should be confined to potential collision effects? If not, please explain your reasons.</p> <p>b) <u>To Natural England</u> - do you accept the Applicants' reasoning on pages 49-50 of [REP10-017] that any 'mortality debt' associated with collision effects would be tolerable in this case? If not, please explain your reasons.</p> <p>c) <u>To Natural England</u> - do you accept the Applicants' reasoning on page 68-69 of [REP9-016] that the smaller number of predicted</p>

ExQs <b>3</b>	Question to:		Question:
			<p>mortalities arising from this project, relative to the predicted mortalities from Hornsea Project Three, justifies the absence of any requirement in Schedule 18 to wait for compensation to become effective before the wind farm may begin operation? If not, please explain your reasons.</p> <p>d) <u>To the Applicants</u> – if an approach was to be taken within Schedule 18 that required all of the proposed compensation measures to be effectively compensating prior to the potential adverse effects arising (in the manner seen, for example, in the Hornsea Project Three DCO), what (if any) would be the implications for the delivery programme, cost and financial viability of the project as a whole?</p>
3.2.12.	The Applicants, RSPB and Natural England	<b>1</b>	<p><b>2</b> <b>Without prejudice compensation measures [REP8-089]: duration of compensation measures</b></p> <p>The RSPB has highlighted [REP10-054] provisions in Schedule 14, Part 1, article 7 of the made Hornsea Project Three DCO, which require that artificial nest structures for kittiwake must be maintained beyond the lifetime of the authorised development if they are colonised, with routine and adaptive management measures continuing whilst the structures are in place. Schedule 18, Part 1, article 7 of the dDCO for this project does not include comparable provisions.</p> <p>a) Whilst noting the Applicants’ comments on pages 10 and 11 of [REP9-020], including that the EC Guidance does not explicitly require compensation measures to be provided in perpetuity, please could the Applicants set out the justification for taking a different approach in this case to that deemed to be necessary in the recently made DCO for Hornsea Project Three?</p>



ExQs <b>3</b>	Question to:			Question:
				<p>b) Please could the Applicants set out the justification for departing from Defra advice<sup>3</sup> to Competent Authorities that they “<i>should make sure the compensatory measures...will remain in place all the time they’re needed, which in most cases will be indefinitely</i>”?</p> <p>c) <u>To the Applicants, RSPB and Natural England</u> - The RSPB has raised this matter in relation to kittiwake, however arguably the principle has wider applicability, not least in this case to artificial nesting sites for gannet. Should an approach be taken in Schedule 18 Part 1 which requires the compensatory measures to remain in place beyond the decommissioning of the wind farm where those measures have been colonised, which of the other Parts of Schedule 18 (i.e. which other compensation measures), if any, might require similar amendment?</p> <p>d) Further to the question in part (c), what does Natural England consider would happen to these sites in terms of their management and status if they were to be maintained after the wind farm has been decommissioned?</p> <p>e) Could the Applicants please explain any implications of the above approach for the Offshore Ornithology Compensation Measures Funding Statement [REP8-081]?</p>
3.2.13.	The Applicants	<b>1</b>	<b>2</b>	<p><b>Offshore Ornithology Compensation Measures Funding Statement [REP8-081]</b>                      A separate Offshore Ornithology Compensation Measures Funding Statement [REP8-081] has been submitted for each project.</p>

<sup>3</sup> Defra/NE Guidance (24 Feb 2021) ‘HRAs: protecting a European site’

ExQs <b>3</b>			
	Question to:		Question:
			a) Please could the Applicants confirm that the cost estimates for each project would remain as quoted, even if only one of the projects was to be constructed? b) Would the proposed compensation measures still be deliverable if only one of the projects was to be constructed?
3.2.14.	The Applicants	<b>1</b>	<b>2</b> <b>Without prejudice compensation measures [REP8-089]: quantification of effect</b> The appendices for [REP8-089] (noting these are unique to each project) follow a standard format, dealing with each species in turn. Under the heading of 'quantification of effect', appendices 1-5 attempt to quantify the effect of the project, alone and then in-combination, upon the feature of the European site. For appendix 6 (red-throated diver) however, there is no clear quantification of the potential effect, either of the project alone or in-combination.  a) Please could the Applicants explain the reasons for this? b) If it is possible to include this information within appendix 6, then please could the Applicants do so in the updated document.
3.2.15.	Natural England, RSPB	<b>1</b>	<b>2</b> <b>Without prejudice compensation measures [REP8-089]: quantification of effects</b> In a number of appendices to [REP8-089], the Applicants advance the argument that, " <i>(t)he Project's impacts are small compared with those for most other windfarms, and would also be more than offset by the difference between the total collisions based on consented windfarm designs compared with as-built designs</i> ".  How do Natural England and the RSPB respond to this statement?

ExQs <b>3</b>			
	Question to:		Question:
3.2.16.	Natural England, RSPB	<b>1</b>	<b>2</b> <b>Compensatory measures for the guillemot and razorbill features of the FFC SPA</b> In response to Natural England's advice [REP9-065] that because the FFC SPA is classified for the <i>albionis</i> sub-species of guillemot, compensation should be ideally directed towards this sub-species, the Applicants make the case [REP10-017, page 14] that the <i>albionis</i> and <i>aalge</i> sub-species are probably not biologically valid classifications or genuinely separate populations, and therefore that compensation at colonies within the range of <i>aalge</i> would still improve the conservation status of colonies in the <i>albionis</i> area. Do Natural England and RSPB accept the evidence and logic progressed by the Applicants in this regard? If not, please explain and evidence your position.
3.2.17.	The Applicants	<b>1</b>	<b>2</b> <b>Without prejudice compensation measures [REP8-089]: relevant Guidance</b> It is noted that the updated HRA Derogation Case [REP8-089] takes into account the Defra/NE (2021) Guidance 'HRAs: protecting a European site'. However, the updated HRA compensation measures document [REP8-089] appears not to do so.  Whilst acknowledging that the 2021 Guidance broadly follows the practice established by predecessor guidance, for completeness please update the compensation measures document to have regard to it, as requested in ISH14 action point 2 [EV-126a].
3.2.18.	The Applicants	<b>1</b>	<b>2</b> <b>Without prejudice compensation measures [REP8-089]: updates</b> Some parts of [REP8-089] appear to have been overtaken by subsequent events or agreements. For example, section 10.3.1 of the

ExQs <b>3</b>			
	Question to:		Question:
			<p>East Anglia TWO document indicates that Natural England is not able to advise that an AEoI on RTD of the OTE SPA for the project alone can be ruled out, whereas in [REP8-110] and [REP8-166] Natural England appear to accept that it can be.</p> <p>Please could the Applicants review the content of [REP8-089] for both projects and ensure that the documents present the latest available information and status of agreement.</p>
3.2.19.	The Applicants	<b>1</b>	<p><b>2</b> <b>Compensatory measures: prey availability measures</b>            In [REP10-051], Natural England sets out the reasons why it contends that <i>"to deliver the most ecologically robust outcome, prey availability measures are the most appropriate compensatory mechanism to attempt to progress"</i>.</p> <p>How do the Applicants respond to this advice?</p>
3.2.20.	Natural England	<b>1</b>	<p><b>2</b> <b>Compensatory measures: prey availability measures</b>            In [REP10-051], Natural England states that <i>"developing a strategic approach to increasing prey availability will be more judicious"</i>.</p> <p>a) Do you consider that there would be a realistic prospect of such a strategic approach being developed within the period necessary for the commencement of the EA1N and EA2 projects?</p> <p>b) How in practical terms do you envisage that an individual developer (or pair of developers) could drive this strategic approach forward with the range of government, conservation, renewables and fisheries stakeholders that would need to be involved?</p>

ExQs <b>3</b>		Question to:	Question:
<b>Marine mammals</b>			
3.2.21.	Marine Management Organisation	<b>1</b>	<p><b>2 In-combination effects on the Southern North Sea (SNS) SAC</b>                      Natural England’s position has remained throughout examination that it cannot exclude adverse effect on integrity of the SNS SAC in-combination until a mechanism is in place to manage multiple SIPs. This is a matter that Natural England acknowledges is a wider, regulatory issue rather than a project-specific one. Nonetheless, the ExAs will need to form recommendations on this matter for the projects before us. In [REP9-060], the Marine Management Organisation (MMO) states that it “<i>acknowledges these comments and believes that the SNS SAC SIP is the appropriate document to manage the in-combination noise impacts, along with the SNS Regulators Working Group</i>”.</p> <p>a) Could the MMO please submit the terms of reference for the SNS Regulators Working Group and confirm whether the control of in-combination underwater noise impacts on features of the SAC is within the scope of the Group's responsibilities.</p> <p>b) Please could the MMO elaborate on how this management of in-combination noise impacts will work in a practical sense - is it limited to the management of the SNS activity tracker or are there other functions of the Working Group in coordinating the noisy activities of multiple projects?</p>
3.2.22.	Natural England	<b>1</b>	<p><b>2 In-Principle Site Integrity Plan (SIP) for the Southern North Sea (SNS) SAC</b>                      Natural England’s response to outstanding ISH7 action point 9 [REP8-165] directs the reader to [REP8-161]. However, a direct response to</p>

ExQs <b>3</b>			
	Question to:		Question:
			<p>action point 9 appears not be included in [REP8-161]. Please could Natural England respond to these points:</p> <p>a) Do you agree that the IP SIP provides an appropriate framework to agree mitigation measures and that the scope of the measures within the IP SIP are appropriate?</p> <p>b) Are you satisfied that through the IP SIP, the Applicants will use the most appropriate measures for the Project based on best knowledge, evidence and proven available technology at the time of construction?</p> <p>c) Do you have confidence that the mitigation measures contained in the IP SIP are deliverable?</p>
3.2.23.	Natural England	<b>1</b>	<p><b>2</b></p> <p><b>In-Principle Site Integrity Plan (SIP) for the Southern North Sea (SNS) SAC</b></p> <p>The updated In-Principle SIP [REP8-031] is clear that the document will need to be reviewed once any final management measures for the Southern North Sea SAC are defined or further advice is provided.</p> <p>On the basis of the best available information, could Natural England please indicate when any final management measures for the SNS SAC can be expected, and whether there is any potential for the management measures to be made available within the timescales of these examinations?</p>
3.2.24.	Marine Management Organisation	<b>1</b>	<p><b>2</b></p> <p><b>Marine mammals: underwater noise modelling update [REP8-040]</b></p> <p>It is apparent from submissions that there are ongoing discussions</p>

ExQs <b>3</b>			
Question to:	Question:		
			<p>between the Applicants and the MMO in relation to underwater noise modelling and specifically [REP8-040].</p> <p>Please could the MMO respond to [REP8-040] and set out any outstanding concerns in full by Deadline 11.</p>
<b>Benthic ecology</b>			
3.2.25.	Natural England, Marine Management Organisation		<p><b>Benthic ecology: Security for reef buffer</b></p> <p>Noting the Applicants response to ExQ2.2.15 [REP6-061], does NE and the MMO consider that the MMO has adequate control through the approval process as currently documented to ensure that significant impacts on <i>Sabellaria</i> reef are avoided?</p>
3.2.26.	Natural England, Marine Management Organisation		<p><b>Benthic ecology: Cable installation in mixed sediments</b></p> <p>Noting the Applicants response to ExQ2.2.17 [REP6-061] and taking specific note that the additional measured used at Boreas related to cable installation with a SAC whereas that is not proposed here, does NE and the MMO consider that any additional measures or controls around cable installations in mixed sediments are required?</p>
<b>Fish ecology</b>			
3.2.27.	The Applicants, Marine Management Organisation and any Interested Party concerned with fish ecology and fisheries		<p><b>Herring Spawning</b></p> <p>The MMO made comments at D9 [REP9-060] raising ongoing concerns about DMLs conditions 29 (Schs 13) and 25 (Schs 14) in relation to herring spawning. The Applicants' D10 Submission [D10-014] identified this as an ongoing unresolved matter. The MMO continues to seek a seasonal piling and UXO detonation restriction during the herring</p>

ExQs <b>3</b>	Question to:	Question:
		<p>spawning period, (but subject to confirmation/ variation in writing between the MMO and the undertaker(s)). The Applicants seek to maintain their position at D9 [REP9-021] that current drafting referring to a period of '<i>approximately 14 days</i>' is precise and enforceable and so meets the five tests for a planning condition set out in the <a href="#">NPPF</a> at paragraph 55. The MMO maintains its view that they are not and has advanced alternative wording that the Applicants have not adopted.</p> <p>The ExAs remind both parties of the importance of, where possible, reaching an agreed position before the end of the Examinations and the undesirability of further consultation being required on this point during the decision-making period by the SoS, as occurred in <a href="#">the Thanet Extension Offshore Wind Farm decision-making process</a> on the same point – in correspondence from BEIS to the parties in that Examination dated 21 November 2019 at paragraph 10 – fish spawning). The ExAs refer the parties to the drafting consulted on by the SoS in that case to assist discussions.</p> <p>By D11 the parties are requested to have agreed drafting on this point or to put in final alternative drafts, followed by final comments from the MMO at D12 and a closing position from the Applicants at D13, enabling the matter to be adjudicated by the ExAs.</p> <p>The dDCO Commentaries also refer at page 18 (Fish Spawning Conditions (Schs 13 Conditions 29 and Schs 14 Conditions 25))</p>



ExQs <b>3</b>		Question to:	Question:
<b>Terrestrial ecology</b>			
3.2.28.	Natural England, ESC	<b>1</b>	<b>2</b> <b>Ammonia emissions on Leiston-Aldeburgh SSSI and Sandlings SPA</b> In the representation from SEAS [REP5-109] and at ISH 14 the issue of the impact of emissions, in particular ammonia, on Leiston-Aldeburgh SSSI and Sandlings SPA was raised by Mr Redmore. The Applicants responded to this in [REP6-032]. Having regard to these submissions, please comment on whether this matter has been properly assessed by the Applicants and what you consider the impacts on the habitats and species of the aforementioned SSSI and SPA would be as a result of vehicular and machinery emissions associated with the Proposed Developments.
3.2.29.	The Applicants	<b>1</b>	<b>2</b> <b>Badger setts and construction timetable</b> Should any main badger setts need to be removed, please confirm that there would be sufficient time within the overall construction timetable for the mitigation measures set out in the Badger Mitigation Statement [REP6-050] to be undertaken and to take proper effect before their closure.
3.2.30.	Natural England	<b>1</b>	<b>2</b> <b>Removal of Badger Setts</b> The Applicants have confirmed in [REP9-016] that as detailed design information is not currently available then the worst-case scenario is that the known active badger sett along the cable corridor will require removal. Given that you have stated that without further information this would be of major concern, what further information would you be seeking from the Applicants on this matter and in your view is the matter resolvable during the Examinations?

ExQs <b>3</b>			
	Question to:		Question:
3.2.31.	The Applicants	<b>1</b>	<b>2</b> <b>Lowland mixed deciduous woodland mitigation</b> Natural England states in [REP10-052] that lowland mixed deciduous woodland is declining and that every effort should be made to avoid its loss. The OLEMS state that the planting of trees over the cable corridor will not be possible. Please provide further details on how impacts to this woodland and fragmentation thereof will be mitigated in terms of avoiding loss and providing enhancements to this habitat.
3.2.32.	The Applicants	<b>1</b>	<b>2</b> <b>Hairy Dragonfly</b> In [REP10-052] Natural England recommends that a survey for hairy dragonfly can now take place at the end of May/beginning of June to better understand the potential presence of hairy dragonfly and potential use of the meadow adjacent to the Hundred River.  a) Will any further surveys be undertaken and submitted into the Examinations? b) If so, please indicate at which deadline additional survey results will be available. c) If not, then please explain your reasoning, responding to comments from Natural England.
3.2.33.	The Applicants	<b>1</b>	<b>2</b> <b>Noise and ecological issues at landfall</b> Please respond to Natural England's query in [REP7-074] regarding what would happen if there was a conflict between reducing noise and increasing ecological issues in the placement of the equipment at landfall. How is this accounted for in the dDCO?
3.2.34.	Natural England	<b>1</b>	<b>2</b> <b>Nightingale mitigation</b> In your D5 [REP5-084] and D8 [REP8-162] submissions you stated that the nightingale mitigation measures within the SPA crossing Method

ExQs <b>3</b>		Question to:	Question:
			<p>Statement were fundamental to preventing an AEoI of the Sandlings SPA and should be secured by way of Requirement. Could you please justify this position given that nightingale is a named component of the SSSI but not a qualifying feature of the Sandlings SPA?</p> <p>The dDCO Commentaries also refer at page 15 (Missing Requirement – Ecosystem Services for Sandlings SPA)</p>
<b>3.3.</b>	<b>Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations</b>		
The ExAs have no questions in this round.			
<b>3.4.</b>	<b>Construction</b>		
The ExAs have no questions in this round.			
<b>3.5.</b>	<b>Draft Development Consent Orders (dDCOs)</b>		
Please see separately published ExAs' Commentaries on the dDCOs. Note that technically specialist matters arising with a bearing on the dDCOs are raised under individual subject matters in this commentary.			
<b>3.6.</b>	<b>Electricity Connections, Infrastructure and Other Users</b>		
The ExAs have no questions in this round.			

ExQs <b>3</b>			
Question to:		Question:	
<b>3.7.</b>	<b>Flood Risk, Water Quality and Resources</b>		
3.7.1.	The Applicants	<b>1</b>	<b>2</b> <b>HDD and groundwater</b> Paragraph 15 of [REP6-021] notes that any drilling fluid losses using HDD would be confined to a very limited area around the drill and that the drilling fluid will fill in and stabilise fractures created during the drilling process so that there would not be an impact on the wider aquifer or the groundwater it contains.  a) Please define what is considered a very limited area. b) Please explain in full how this and the filling in of fractures created during the drilling process will ensure that there will not be an impact on the wider aquifer or the groundwater it contains.
3.7.2.	The Applicants	<b>1</b>	<b>2</b> <b>Water supply at Ness House well</b> Please provide more detailed information on the proposed water quality and levels monitoring regime at Ness House well and the temporary potable water supply that is proposed to be tied into the well for the duration of HDD activities.
3.7.3.	Suffolk County Council	<b>1</b>	<b>2</b> <b>Need for Land Drainage Act 1991 Consents</b> What, if any, specific issues would require determination of individual consents under the Land Drainage Act 1991? Can those matters be addressed with an appropriate form of consent provided under the dDCOs (dDCOs Commentaries on Arts 16 refers)?

ExQs <b>3</b>			
Question to:		Question:	
<b>3.8.</b>	<b>Historic Environment</b>		
3.8.1.	The Applicants, Suffolk County Council	<b>1</b>	<b>2</b> <b>Archaeology</b> The ExAs note the comments of Suffolk County Council at Deadline 10 [REP10-043] relating to the Applicant's Topic Position Statement [REP9-009].  <u>To the Applicants:</u>  a) Provide any response to the comments of SCC, should you wish to do so.  <u>To SCC:</u>  b) For clarification, will the pre-construction trial trenching and works being carried out by the Applicants resolve your concerns? Is the 'other outstanding assessment work' also being carried out?
3.8.2.	The Applicants	<b>1</b>	<b>2</b> <b>High House Farm</b> Your Deadline 10 document [REP10-025] states that the current view of the Church from High House Farm would be obstructed by mitigation planting rather than by the proposed Project's electrical infrastructure.  While this statement may be technically correct, does it sufficiently describe and characterise the adverse effect on this heritage asset, taking into consideration that the proposed planting will be established solely to screen the proposed projects and will take time to establish?

ExQs <b>3</b>			
ExQs	Question to:		Question:
3.8.3.	The Applicants	<b>1</b>	<p><b>2</b> <b>Sealing End Compounds</b></p> <p>Your answer to ExQ2.8.7 [REP6-062] details the process of positioning of proposed cable sealing end compounds, noting that they are driven by the positioning of the pylons to which they are connected, and that their proximity and orientation are governed by construction, operation and maintenance safety and operational requirements. The answer also notes that where practicable the cable sealing end compounds will be aligned to the same orientation as adjacent field boundaries.</p> <p>Given the highly detailed extensive electrical safety requirements, is it likely that any such re-alignment of the cable sealing end compounds to field boundaries will be able to take place?</p>
3.8.4.	The Applicants, East Suffolk Council, Suffolk County Council, Historic England, and any other interested IPs.	<b>1</b>	<p><b>2</b> <b>Cumulative Impacts</b></p> <p>The ExAs note in the Clarification Note – Archaeology and Cultural Heritage [REP1-021] that the Applicants acknowledge that the public right of way trackway to the north of the Church of St Mary which follows the parish and Hundred boundary should be considered as a heritage asset in its own right. The trackway/public right of way links the Church of St Mary, a Grade II* listed building to Little Moor Farm, a Grade II listed building.</p> <p>a) Given the link that the acknowledged (undesignated) heritage asset trackway provides between the Church and Little Moor Farm, does this increase the significance of the two designated heritage assets, either individually or cumulatively (or both)?</p> <p>b) If yes, how would this significance be affected by the proposed projects?</p>

ExQs <b>3</b>			
Question to:		Question:	
3.9.	<b>Land Use</b>	The ExAs have no questions in this round.	
3.10.	<b>Landscape and Visual Impact</b>		
3.10.1.	The Applicants	<b>1</b>	<b>2</b> <b>Planting Proposals</b> Your answer to ExQ2.10.4 [REP6-063] states that no decision will be made on the provenance of trees which will be subject of a post-consent procurement process, with most planting not required until around 2024.  Will local sourcing of required stock be weighted favourably in the procurement process? If so, could this be confirmed in the Outline Landscape and Ecological Management Strategy (OLEMS)?
3.10.2.	The Applicants	<b>1</b>	<b>2</b> <b>OLEMS</b> Your answer to ExQ2.10.5 [REP6-063] relates to planting and High House Farm. The ExAs note that you are seeking to balance the proposals in trying to not enclose historic farms while mitigating visual effects on people living in the area. Your answer states that the proposed planting close to the south western boundary of High House Farm is adjacent to existing woodland within the curtilage of this property. An annotated aerial photograph is submitted as part of the answer to demonstrate this point.  However, the ExAs noted on their site visits [EV-007d, and as referred to in ExQ2.8.2] that the garden of High House Farm provided clear views across a largely open landscape to the Church of St Mary. This

ExQs <b>3</b>			
	Question to:		Question:
			<p>effect was increased by the removal of various ash trees in recent times due to disease [referenced in EV-007d] which would likely change the aerial photograph were it to be taken now.</p> <p>Given this do you wish to add to your answer ExQ2.10.5?</p>
3.10.3.	The Applicants	<b>1</b>	<p><b>2</b> <b>Combined effect of pylons and proposals</b></p> <p>Pylons are often referred to as 'marching across the landscape', which partly could be a consequence of their height and form but also due to the open frame of the pylons themselves and the space that remains beneath them. SASES [REP6-133] state that the proposals would have the effect of making the pylons more dominant than they currently appear, due to the change in the landscape around them that the proposals would cause with an open rural landscape being replaced by a more industrial one</p> <p>Respond to the above point.</p>
3.10.4.	The Applicants	<b>1</b>	<p><b>2</b> <b>Landscaping – Future</b></p> <p>Your answer to ExQ2.10.8 [REP6-063] states:</p> <p><i>"The Applicants are not designing the landscaping proposals to accommodate any future projects. Any potential future connections would need to work within the constraints of the Projects' onshore infrastructure and landscaping and address this within their scheme design and consent application."</i></p> <p>The OLEMS [REP10-005] states:</p>



ExQs <b>3</b>		Question to:	Question:
			<p><i>"The planting and landscape scheme has also been designed in order to not sterilise land for potential future development associated with the National Grid substation."</i></p> <p>Explain the apparent difference between these two statements.</p>
<b>3.11.</b>	<b>Marine and Coastal Physical Processes</b>		
3.11.1.	EDF Energy Nuclear Generation Ltd, ESC, MMO	<b>1</b>	<p><b>2</b> <b>Avoidance of the Coralline Crag</b></p> <p>Paragraph 15 of the Landfall Hydrogeological Risk Assessment [REP6-021] states that the HDD is expected to be within the Coralline Crag beneath the cliffs, and the strength of the Coralline Crag is expected to prevent any drilling fluid breakout at this point. In [REP8-052] the Applicants state that complete avoidance of the Coralline Crag has never been proposed. The Applicants go on to state any reference to avoiding direct physical disruption to the outcrop of Coralline Crag refers to the parts of the Crag that are visible at the surface; the HDD bores as proposed pass through the Coralline Crag, but beneath its visible surface before 'punching out'.</p> <p>a) Please could you confirm that in referring to the avoidance of direct physical disruption to the outcrop of Coralline Crag it was also your understanding that this meant only those parts visible at the surface and that the HDD bores would in fact pass through the Coralline Crag?</p> <p>b) If this was not your understanding does this cause any concern and what would be the implications?</p>

ExQs <b>3</b>			
	Question to:		Question:
3.11.2.	The Applicants, MMO	<b>1</b>	<b>2</b> <b>HDD and the lead regulator</b> In [REP7-074] NE states that for most other OWF projects, excluding EA1 and EA3, the MMO has been the lead regulator due to environmental issues normally occurring below Mean High Water.  a) How would this work in practice with the LPA leading on HDD activities? b) How will MMO be incorporated in the decision making for the marine elements of HDD?
3.11.3.	The Applicants	<b>1</b>	<b>2</b> <b>HDD feasibility</b> Please comment on NE's assertion in [REP7-074] that even short sections of HDD can fail (eg Lincs OWF 2010). It also notes that in recent years there have been issues with sinkholes (eg Hornsea 2 and Triton Knoll) and even though sediment conditions are different, lessons must be learnt to make sure it won't happen here. Should this be considered in the HDD verification note? If not, please justify why.
3.11.4.	The Applicants	<b>1</b>	<b>2</b> <b>Monitoring of coastal processes and remedial action</b> Both monitoring of coastal processes and remedial action are relevant to NE and MMO. How will consultation be undertaken?
<b>3.12.</b>	<b>Marine Effects</b>		
The ExAs have no questions in this round.			
<b>3.13.</b>	<b>Nuisance and other Public Health Effects</b>		
The ExAs have no questions in this round.			

ExQs <b>3</b>		
Question to:	Question:	
<b>3.14.</b>	<b>Other Projects and Proposals</b>	
3.14.1.	National Grid Ventures	<p><b>1 2</b></p> <p><b>Extension of National Grid Substation Appraisal</b></p> <p>The ExAs note that, in addition to substation extension bays, the Nautilus and EuroLink interconnector projects would require a converter station “in proximity” to any substation and that this equates to some 5km radius (maximum) from the NGET substation for size and efficiency reasons [REP9-062]</p> <p>a) Is it most efficient to provide a converter station as close as possible to the substation extension bays?</p> <p>b) A 5km radius equates to roughly 3.1miles from the proposed Friston substations. Outline the process by which the proposed converter stations sites will be chosen. Would the presence of a permitted NGET substation at Friston weigh in favour of a site being chosen adjacent to the same site?</p> <p>Appendix 1 to [REP9-062] contains a Nautilus Project Update document (April 2021). This document contains details of “The vision for Multi-Purpose Interconnectors” which it is stated will help to reduce impacts on coastal communities with fewer individual connections and less construction works needed.</p> <p>c) While reducing the number of individual connections could reduce overall impacts on coastal communities, could conversely this also lead to larger impacts on the area chosen for the single, presumably larger, connection?</p> <p>d) Is Friston being considered as a Multi-Purpose Interconnector?</p>

ExQs <b>3</b>			
	Question to:		Question:
3.14.2.	The Applicants	<b>1</b>	<b>2</b> <b>Extension of National Grid Substation Appraisal [REP8-074]</b> Your comments on those of East Suffolk Council relating to the above document [REP10-007] provide figures for additional storage capacity required for drainage purposes which may be required on the site for infiltration only, hybrid, and attenuation only schemes.  Given the work you have carried out on the site, including detailed layout options, how much impact do you consider the approximate drainage areas outlined would have on the landscaping proposed for the East Anglia ONE North and East Anglia TWO substation sites?
3.14.3.	The Applicants	<b>1</b>	<b>2</b> <b>Extension of National Grid Substation Appraisal [REP8-074]</b> The ExAs note the production of the above appraisal. The current layout plan for the projects has significant areas of land close to the proposals allocated for landscaping and drainage provision. Has any assessment been made of the potential 'knock on' effects that the possible extension of the National Grid substation would have on the proposed mitigation measures for the projects?
3.14.4.	The Applicants	<b>1</b>	<b>2</b> <b>Extension of National Grid Substation Appraisal – Photomontages</b>  a) The proposed viewpoint 2 [REP8-071] for the above appraisal (Friston, Church Road) indicates that the National Grid substation with extension bays, when combined with the two SPR substations would fill much of the viewpoint horizon, with the western extension bay remaining fairly visible after 15 years. Given this do you maintain that this level of change would not result in any cumulative impact on the significance of the Church of St Mary?

ExQs <b>3</b>	Question to:		Question:
			b) Viewpoint 5 (Public Right of Way, near Moor Farm) [REP8-072] demonstrates that at year 15 the western half of the view would have a clear aspect of a substantial amount of electrical equipment. Given this and the proximity of this viewpoint to the southern boundary of High House Farm (and given recent reductions to woodland cover of this property) do you still consider that adverse impact for this heritage asset would remain of a low magnitude?
3.14.5.	The Applicants, Suffolk County Council, East Suffolk Council and all other interested parties	<b>1</b>	<b>2</b> <b>Future uncertainty</b> Bearing in mind any implications of the Norfolk Vanguard judgement, how would the parties propose the ExAs advise the Secretary of State in relation to the uncertainty about possible future development at Friston and in the wider area created by the precedent case, in the event that either one or both projects is approved, and by the clear evidence submitted to the examinations that (a) the potential to extend the proposed National Grid substation has been demonstrated and (b) the proposed Eurolink and Nautilus inter-connectors are exploring a landfall location between Thorpeness and Sizewell and the possibility of making a National Grid connection in the Leiston area, via onshore substations located within 5k of a National Grid substation?
3.14.6.	The Applicants	<b>1</b>	<b>2</b> <b>National Grid Ventures submission [REP9-062]</b> The ExAs note the contents of the above National Grid Ventures (NGV) submission as well as your response to this [REP10-016]. The NGV submission provides information which could assist in an assessment of cumulative impacts and ExQ3.14.1 raises questions for NGV based on this submission and future potential proposals for the Friston sites.

ExQs <b>3</b>		Question to:	Question:
			Should you wish to do so, make any further representations on this matter.
<b>3.15.</b>	<b>Project Descriptions and Sites Selections</b>		
The ExAs have no questions in this round.			
<b>3.16.</b>	<b>Seascape, Landscape and Visual Amenity</b>		
3.16.1.	The Applicants and Natural England.	<b>2</b>	<p><b>Seascape</b></p> <p>The ExA note the positions of the Applicant and Natural England concerning any effects of the project on matters of seascape as detailed by Natural England [REP10-053] and the Applicant [REP9-017]. The ExA note that the position appears stable – that is that both parties agree to disagree with no further comments.</p> <p>Respond to the above statement with any further comments, should you wish to do so.</p>
<b>3.17.</b>	<b>Socio-economic Effects</b>		
3.17.1.	Suffolk Coast DMO	<b>1 2</b>	<p><b>Suffolk Coast DMO 'The Energy Coast' Report 2019</b></p> <p>The Applicants consider the stimuli used in the above report were used out of context and did not provide adequate information about the projects [REP7-034].</p> <p>Respond to the above, should you wish to do so.</p>

ExQs <b>3</b>				Question to:	Question:
3.17.2.	The Applicants, Suffolk County Council, East Suffolk Council, Suffolk Coast DMO and any other interested IPs	<b>1</b>	<b>2</b>		<p><b>Tourism Fund</b></p> <p>The ExAs note that the Applicants have committed to providing £150,000 to be paid to the Suffolk Community Foundation to market the area during the construction period of the projects [REP9-041]. The ExAs note that the Applicants do not consider that the Projects will have significant impacts upon visitor perception during construction and direct impacts which could affect visitors already present in the area will be mitigated to not significant levels but that despite this they have committed to the Tourism Fund [REP9-009].</p> <p>Compensation sums that are not secured in the dDCO or accompanying certified documents or in another appropriate and enforceable instrument cannot be accorded weight and may not be able to be taken into account by the ExAs when considering their recommendations.</p> <p>Outline your views on the above statement and proposed fund, including consideration if relevant of how the Fund could assist the area. If the scenario arises that only one project were to be granted consent, would the Tourism Fund agreement remain the same?</p>
3.17.3.	Suffolk Energy Action Solutions	<b>1</b>	<b>2</b>		<p><b>Traffic and effects on tourism</b></p> <p>Your statement on Roads/Traffic and Tourism [REP8-236] is noted. This has been responded to by the Applicants at Deadline 9 [REP9-014]. In addition, the Applicants also respond to [REP5-113] in their answer to ExQ2.17.9 [REP6-064].</p> <p>Respond to the above responses by the Applicants, should you wish to do so.</p>

ExQs <b>3</b>	
Question to:	Question:
3.17.4. The Applicants and any Interested Parties	<p><b>1</b> <b>2</b> <b>Traffic and effects on tourism</b></p> <p>The Applicants response to ExQ2.17.9 states that no IPs have raised the impact of East Anglia ONE on the tourist economy of the Suffolk Coast of the AONB.</p> <p><u>To the Applicants:</u></p> <p>a) Provide further information on the anticipated and any quantified effects of East Anglia ONE on the local tourism industry, should you wish to do so. How do the scale of substations, cable route, and landfall location compare to that proposed in these projects in terms of traffic routes and tourist destinations/facilities?</p> <p><u>To any interested parties:</u></p> <p>b) Comment on the above, should you wish to do so.</p>
<b>3.18.</b>	<b>Transportation and Traffic</b>
The ExAs have no questions in this round.	