



The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 12 - 28 June 2021

East Suffolk Council's Responses to the Examining Authorities' Rule 17 Questions of 18 June 2021

The table below details East Suffolk Council's (ESC) comments in relation to the Rule 17 questions issued by the Examining Authorities (R17QF).

R17QF	Question	Question asked:	1	2	ESC Response
	to:				
Onshore	Substation Sit	ing and Design			
R17QF.	The	Landscape and Visual Impact			c) ESC has noted the proposed revised SUDS basin layout but does
7	Applicants,				not consider that it will have any meaningful overall reduction of
	SCC, ESC,	The Outline Landscape and Ecological			screening effects with the removal of the previously proposed wet
	Historic	Management Strategy (OLEMS) version 6			woodland within the basins. However, it is possible that there may
	England,	dated 11 June 2021 [AS-127] contains an			be some reduction in effectiveness of screening some views
	SASES and	updated design for the proposed SuDS			especially those on the public right of way that runs north-north-
	any other	basins. The revised designs remove			west along eastern boundary to Friston House, and most likely
	Interested	previous areas of wet woodland within			during the winter when leaves are off the trees, and also in the
	Parties.	the basins and appears to reorientate the			early years of screen planting establishment. This conclusion is
		basin for the proposed southern			based on an assumption that the Applicants achieve the predicted
		substations. In addition, text within the			new planting growth rates that have been relied on throughout
		OLEMS has been amended to state that			the examination process.
		SuDS basins "may" be encompassed by			
		bunds (as opposed to "will")			d) It is ESC's understanding that the creation of wet woodland
					within the proposed SuDS basins represented an ecological
		To the Applicants:			enhancement rather than being necessary for mitigation or
					compensation purposes. Therefore, the removal of this habitat
		a) How likely is it that bunding will be			type from the design of the site will result in a potentially lower
		required for the SuDS basins?			amount of ecological enhancement being achieved by the
		b) Para 138 of the OLEMS states that			developments as there will be a less varied suite of habitats
		bunding for landscaping purposes is			created around the substations. The justification provided by the
		subject to detailed design and the			Applicants as to why wet woodland cannot be created in this
		availability of suitable material on site			location is noted and given the constraints stated, ESC
		during construction. If suitable			understands why the design change has been proposed.
		material is on site during construction,			

provide examples of what bunds may be constructed and to what purpose.

To SCC, ESC, Historic England and other Interested Parties:

- c) Provide any further submissions you may to wish to make on the landscape and visual impact of the latest iteration of the proposed SuDS basins.
- d) Does the removal of the previously proposed wet woodland have an adverse effect on the ecological aims of the proposed developments?
- e) Does the removal of the previously proposed wet woodland have an adverse effect on the role of the OLEMS proposals as landscape or historic environment mitigation?

e) As noted in ESC's response to c), the Council does not consider that the revised SuDS basin layout will have any meaningful overall reduction of screening effects with the removal of the previously proposed wet woodland within the basins. However as stated above, it is possible that there may be some reduction in effectiveness of screening some views from the public right of way along the eastern boundary during the winter months and early years of planting establishment.

On this basis, there is potential scope for a reduced role in the effect of the Outline Landscape and Ecological Management Strategy (OLEMS) in mitigating potential landscape or historic environment impacts, but the Council considers that this is minor, seasonal, and temporal albeit dependant on the rate of early years plant establishment. ESC therefore considers that there would be no change to the overall impact on the setting of the listed buildings.

The issues raised in this document highlight the need for ESC to be the discharging authority for all requirements that affect the layout of the area around the substation to ensure a co=ordinated approach to the final detailed designs.

Construction

R17QF.	The	Landscape and Visual Impact:
10	Applicants,	Construction Drainage Management
	SCC, ESC,	
	Historic	The Outline Code of Construction Practice
	England,	[REP11-015] provides an example
	SASES and	construction surface water drainage
	any other	scheme at the Substations Location

In relation to other construction activity, ESC does not consider that these temporary construction drainage basins will have any meaningful impact on the overall landscape and visual impacts arising during the construction phase. The only caveat to this would be if the substations were not built simultaneously but sequentially and any screen planting that was planted after a first phase was later disrupted or removed to achieve later phase

to make on any impacts of to proposed construction surface was drainage scheme on matters landscape, visual impact and setting of heritage assets.	of		amenity. The Outline Code of Construction Practice does not assess the potential impacts on the setting of the heritage assets. Notwithstanding this, as the temporary construction drainage basins would not have a meaningful impact on the structural landscape mitigation planting, ESC considers there would not be a notable impact on the settings of the heritage assets.
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