



## **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 Applicants'  
Deadline 11 Submissions**

**Review of Additional Information Submitted by the Applicants at Deadline 11**

**1. Introduction**

1.1. East Suffolk Council (ESC) noted that the following additional information has been provided by the Applicants at Deadline 11 and subsequent to Deadline 11 which is of relevance to the ESC's responsibilities:

- Applicants' Comments on East Suffolk Council's Deadline 10 Submissions – REP11-050
- Substations Design Principles Statement – AS-134
- Applicants' Responses to ExQ3 Volumes – REP11-072, REP11-085, REP11-086, REP11-088 to REP11-094
- Applicants' Responses to Hearing Action Points (Issue Specific Hearing 16 and Issue Specific Hearing 17) – REP11-082
- Deadline 11 Project Update – REP11-053
- Land Plans – REP11-003
- Work Plans – REP11-004
- Outline Code of Construction Practice – REP11-015
- Outline Construction Traffic Management Plan – REP11-017
- Outline Landscape and Ecological Management Strategy – AS-127
- Outline Port Construction Traffic Management Plan – REP11-024
- Outline Operational Drainage Management Plan – AS-125
- Outline Watercourse Crossing Method Statement – REP11-074
- Hundred River Ecology Survey Report – REP11-063
- Heritage Assessment GIS Addendum and Appendices – REP11-075 to REP11-080
- Landscape and Visual Impact GIS Addendum and Appendices – REP11-028 to REP11-044
- Applicants' Written Summary of Oral Case Issue Specific Hearing 16 – AS-136
- Applicants' Written Summary of Oral Case Issue Specific Hearing 17 – REP11-084
- Applicants' Comments on the ExA's Commentary on the dDCO – REP11-081

1.2. ESC has reviewed the above documents and provided comments where relevant in the table on page 4. The comments provided relate to both East Anglia One North (EA1N) and East Anglia Two (EA2) projects.

1.3. The comments contained within this document are from ESC. ESC continues to work closely with Suffolk County Council (SCC) on these projects but to avoid repetition, each Council will lead on specific topic areas as set out in the Councils' joint Local Impact Report (REP1-132).

- 1.4. ESC noted the further questions asked on 18 June 2021 by the Examining Authorities under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010. ESC has provided a response to these questions separately.

The table below details ESC’s comments in relation to additional information submitted by the Applicants at Deadline 11.

Document submitted at Deadline 11		East Suffolk Council’s Comments
<b>Applicants’ Responses to Hearings Action Points (ISH16 and ISH17) – REP11-082</b>		
<p>Table 2 Applicants’ Response to ISH17 Actions                      Number 5 – Impacts on noise and ecological receptors</p>		<p>ESC welcomes the inclusion of a commitment within the third design principle in Table 5.1 in the Substations Design Principles Statement (AS-134), that the Operational Noise Design Report will include details of high frequency noise information.</p> <p>The Outline Landscape and Ecological Management Strategy (OLEMS, AS-127) has also been updated to identify that landscape planting at Work No.29 will be specifically designed and provided primarily as mitigation for foraging and commuting bats (paragraphs 185, 273). If therefore high frequency noise is identified within the operational noise from the substations, which is not or cannot be addressed by mitigation measures provided at the substations, appropriate mitigation has been secured within the OLEMS.</p>
<p>ID26 and ID35</p>		<p>ESC notes that the Outline Code of Construction Practice (OCoCP, REP11-015) states: <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.”</i> ESC has interpreted this as including both natural habitat and human sensitive air quality receptors.</p> <p>This may also be addressed by the Applicants in response to ESC’s Deadline 11 submission (REP11-110) comments in relation to OCoCP paragraph 145.</p>
<p>ID36</p>		<p>ESC previously commented (REP11-110) in relation to paragraph 70 of the Outline Construction Traffic Management Plan: <i>“It would be helpful for this paragraph to confirm that the highest emissions standard vehicles available will be used, and the majority of non-Euro VI HGVs will be Euro V, consistent with the information provided in Section 5.1.5 of the document.”</i> The Applicants responded: <i>“The Applicants will ensure paragraph 70 is amended to align with the text in Section 5.1.5 of the document”</i> (REP11-082). However, the revised text does not reflect ESC’s request, which is important for controlling impacts in Stratford St Andrew. ESC therefore maintains this point. There may however be insufficient time within</p>

		the examinations to address this issue and therefore ESC would like this noted by the Applicants and taken into consideration during the drafting of the final document.
<b>Substations Design Principles Statement – AS-134</b>		
Table 5.1, third design principle		ESC welcomes the commitment that the Operational Noise Design Report will include details of high frequency noise information in 1/3 octave bands from 8kHz to 22kHz, where the information is available.
Table 5.1: Missing design principle		ESC maintains its support the inclusion of an additional design principle which would encourage consideration of the potential for the design of the projects to adapt to the changing policy and technological environments. This was most recently set out in the Council’s REP9-040 and REP9-041 submissions but ESC recognises that this is not a matter upon which agreement will be reached.
<b>Outline Landscape Ecological Management Strategy – AS-127</b>		
Section 5.1.1.3 – Work No.29 and paragraph 273		ESC welcomes the commitment to provide Work No.29 primarily in relation to mitigation for foraging and commuting bats.
Removal of paragraph 94 Removal of Table 3.5 – Native Wet Paragraph 109 - Removal of Native wet woodland (W4) Woodland Species Mix (W4)		From an ecological perspective, ESC understands that the creation of wet woodland within the proposed Sustainable Drainage Systems (SuDS) basins represents ecological enhancement rather than being necessary for mitigation or compensation purposes. Therefore, whilst the removal of this habitat type from the design of the site is disappointing and will result in a potentially lower amount of ecological enhancement being achieved, given the justification provided by the Applicants the Council can have no ecological objection to this change.
<b>Outline Watercourse Crossing Method Statement – REP11-074</b>		
Section 4.9 – Tree Protection Paragraph 66		Noted.
<b>Applicants’ Comments on East Suffolk Council’s Deadline 10 Submissions – REP11-050</b>		

<p>ESC’s Summary of Oral Case for ISH14 (REP8-147), Agenda Item 13 – Any other business relevant to the Agenda. ID33</p>		<p>ESC notes and welcomes this commitment.</p>
<p><b>Hundred River Ecology Survey Report - REP11-063</b></p>		
<p>Whole document</p>		<p>ESC notes the findings of this survey and has no further comment to make.</p>
<p><b>Heritage Assessment GIS Addendum – REP11-075</b></p>		
<p>Whole document</p>		<p>The Addendum provides a sufficiently detailed assessment of the potential impacts on the heritage assets, although ESC disagrees with some of the conclusions that are drawn.</p> <p>ESC agree that a Gas Insulated Switchgear (GIS) substation would have a different visual impact than the Air Insulated Switchgear (AIS) approach, as the substation would be taller and have a more solid mass, but on a smaller footprint. The top of the substation would be more visible above the tree line, even after 15 years of mitigation planting in place, however there would be a less widespread impact of infrastructure to the immediate south of Little Moor Farm. Notwithstanding, due to the scale of the EA1N and EA2 Substations and the presence of the cable sealing end compounds, the overall magnitudes of adverse impact on the listed buildings would be similar as with the AIS approach.</p> <p>ESC disagrees with the assessment that the mitigation planting would substantially lower the impact on the setting of Little Moor Farm and Woodside Farm. The visual impact of the GIS substation would still be notable, and as stated in previous responses, while the landscaping would provide a measure of screening, it would not be considered to lower the overall magnitudes of adverse impact.</p> <p>ESC considers that the magnitude of adverse impact of the GIS substation would be at a medium level Little Moor Farm, High House Farm, Woodside Farm, and the Church of St Mary,</p>

		regardless of whether only EA1N, only EA2 or both substations were to be built, and regardless of the mitigation planting.
<b>Landscape and Visual Impact Assessment GIS Addendum – REP11-028</b>		
Whole document		We note the content of the revised Landscape and Visual Impact Assessment (LVIA). We note the findings that the inclusion of GIS options in the LVIA makes no significant change to the conclusions of the original AIS based LVIA. Any suggestion that structures may have additional height over other options raises concerns in relation to potential problems in early screening plant establishment years given the previously recorded concerns with erratic rainfall in eastern Suffolk.