

SCOTTISHPOWER  
RENEWABLES

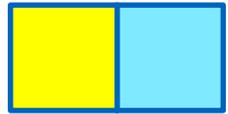
# East Anglia ONE North and East Anglia TWO Offshore Windfarms

## Deadline 13 Topic Position Statements

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited  
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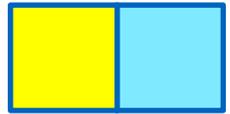
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Applicable to **East Anglia ONE North** and **East Anglia TWO**



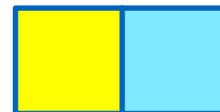
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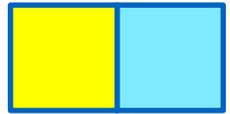
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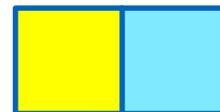


## Glossary of Acronyms

AEoI	Adverse Effect on Integrity
AMP	Access Management Plan
AONB	Area of Outstanding Natural Beauty
BEIS	Department for Business, Energy and Industrial Strategy
CAA	Civil Aviation Authority
CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DEFRA	Department for Environment, Fisheries and Food
DML	Deemed Marine Licence
DMO	Destination Management Organisation
EA	Environment Agency
EIA	Environmental Impact Assessment
EIFCA	Eastern Inshore Fisheries Conservation Authority
EMF	Electromagnetic Frequency
ES	Environmental Statement
ESC	East Suffolk Council
FFC	Flamborough and Filey Coast
GBBG	Greater Black-Backed Gull
GCN	Great Crested Newt
HE	Historic England
HRA	Habitat Regulations Assessment
HVAC	High Voltage Alternative Current
HVDC	High Voltage Direct Current
IDB	Internal Drainage Board
ISH	Issue Specific Hearing
LBBG	Lesser Black-Backed Gull
LoNI	Letters of No Impediment
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
MoD	Ministry of Defence
NATS	National Air Traffic Services
NE	Natural England
NG-ESO	National Grid Electricity System Operator Limited
NGET	National Grid Electricity Transmission
OLEMS	Outline Landscape and Ecological Management Strategy
OTE	Outer Thames Estuary
PD	Procedural Decision
PHE	Public Health England
PRoW	Public Right of Way
RTD	Red Throated Diver
SCC	Suffolk County Council
SCHAONB	Suffolk Coasts and Heath Area of Outstanding Natural Beauty
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SIP	Site Integrity Plan
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNS	Southern North Sea



SPA	Special Protection Area
SoCG	Statement of Common Ground
SPA	Special protected Area
SSSI	Site of Special Scientific Interest



## 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 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.
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 infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
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 substation	The East Anglia TWO / East Anglia ONE North 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 TWO / East Anglia ONE North project.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.

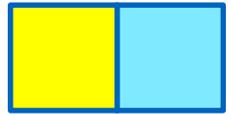


# 1 Introduction

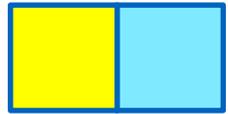
1. This document has been prepared by East Anglia TWO Limited and East Anglia ONE North Limited (the Applicants) in relation to the East Anglia TWO Offshore Windfarm project and the East Anglia ONE North Offshore Windfarm project (the Projects) Development Consent Order (DCO) applications (the Applications). The purpose of this document is to provide position statements on key matters for each Environmental Impact Assessment (EIA) topic considered in the Applications as at Deadline 13 of the DCO Examinations. This document updates the **Deadline 9 Topic Position Statements** (REP9-009) to reflect the progress that has been made on each topic area since Deadline 9, along with the nature of key outstanding matters.
2. This document is applicable to both the East Anglia ONE North and East Anglia TWO 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 23<sup>rd</sup> 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.

## 1.1 Purpose

3. The Applicants consider that summaries for each of the EIA topics would be useful to provide the Examining Authority and stakeholders with an accurate and accessible overview of those matters now closed and those still outstanding. This document reviews the EIA topics as set out in the relevant Statements of Common Ground (SoCG) to highlight areas of agreement and disagreement with the relevant technical stakeholders. The information presented within this document complements that within the **Statement of Commonality** (document reference ExA.SoC.D13.V8).
4. The information set out in **Section 2** and **Section 3** refers to the latest versions of the SoCGs with:
  - East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils) (REP12-070));
  - Natural England (NE) (Offshore SoCG (REP8-109); Onshore SoCG (REP8-108); Offshore Ornithology SoCG (REP8-110); NE Risk and Issues Log (REP10-053));
  - Historic England (HE) (Onshore SoCG (REP8-127); Offshore SoCG (REP8-128));



- Environment Agency (EA) (REP12-071);
  - Marine Management Organisation (MMO) (REP12-073);
  - Eastern Inshore Fisheries Conservation Authority (EIFCA) (REP8-135);
  - Maritime and Coastguard Agency (MCA) (REP8-133);
  - Ministry of Defence (MoD) (REP8-106)
  - Trinity House (REP8-134);
  - Civil Aviation Authority (CAA) (REP8-122);
  - National Air Traffic Services (NATS) (REP12-072)
  - East Suffolk Internal Drainage Board (IDB) (REP8-129);
  - Highways England (REP8-117); and
  - Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) Partnership (REP8-125).
5. In addition, where matters have been resolved without any update to the SoCG this is noted in the tables in **Section 2** and **Section 3** with reference to the document that confirms agreement has been reached.
6. The Applicants acknowledge the input of several other organisations (such as the Royal Society for the Protection of Birds (RSPB) and The Wildlife Trusts (TWT)) to both the Pre-Application and the Examination phases of the DCO process. However, this summary has been limited to the positions of the statutory bodies. The **Statement of Commonality** (document reference ExA.SoC.D13.V8) provides an overview of the final position of each SoCG for a wider range of stakeholders in relation to the Projects at Deadline 13.

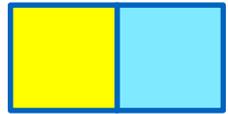


## 2 Summary of Onshore Topic Positions

7. **Table 2.1** provides status summaries for each of the onshore EIA topics. It reviews the EIA topics as set out in the relevant SoCGs to highlight areas of agreement and any outstanding matters with the technical stakeholders (i.e. the regulators or statutory advisors with the relevant technical competence).

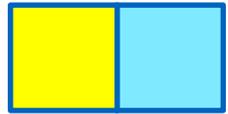
### 2.1 Respective Positions on Cumulative Impact Assessment

8. Regarding Cumulative Impact Assessment (CIA), there remains an outstanding matter between the Applicants and the Councils relating to the consideration of future renewable energy and transmission projects with the potential to be located in East Suffolk. The following sets out Councils' and the Applicants' positions respectively.
9. It was the Councils' understanding that National Grid Electricity System Operator Limited (NG-ESO) had offered, or would offer grid connections at Friston to a number of potential future projects, namely Nautilus Interconnector, Eurolink Interconnector, Galloper Extension (now known as the Five Estuaries) and, Greater Gabbard extension (now known as North Falls).
10. The Councils note the submissions from the promoters of North Falls and Five Estuaries (REP7-066 and AS-100) to the Examinations confirming that North Falls *"Do not currently have any plans to progress any work around Friston, Suffolk"*, that Five Estuaries *"Have accepted a revised connection offer from National Grid"* and that *"By accepting this new connection offer it means that the Five Estuaries project will no longer be pursuing a connection at Friston, Suffolk"*. However, the Councils' understanding is that the two Interconnector projects could connect to the new National Grid substation proposed at Grove Wood, Friston for which the Applicants are seeking consent, and that these future connections would result in the enlargement or extension of the National Grid substation.
11. In addition, the Councils note that an interconnector would require a converter station in the vicinity of any substation to convert the electricity from High Voltage Direct Current (HVDC) to High Voltage Alternating Current (HVAC) in order to connect to the National Grid. The Councils note that National Grid Ventures (NGV), the promoter of the two interconnectors, has reiterated in its response to ExQ3.14.1 at Deadline 11 (REP11-119) that *"NGV have undertaken feasibility work based on the assumption that the proposed NGET [(National Grid Electricity Transmission)] substation connection for both the proposed Nautilus and Eurolink Multi-Purpose Interconnector projects will be at Friston"*. The same



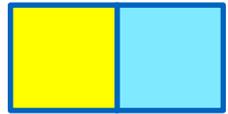
response from NGV states that *“The most efficient technical solution is to locate the converter station as close to the substation extension bays as possible”*, but also that other factors also have to be considered so that *“The presence of a permitted NGET substation at Friston does not necessarily mean an adjacent site will be the most appropriate for a converter station when balancing environmental, socio-economic and technical objectives”*.

12. The Councils maintain that these future energy projects should be included in the Projects’ CIA. While full information may not yet be available, the Councils believe that NG-ESO is likely to be able to provide information on the effects of further grid connections on the National Grid Infrastructure proposed at Grove Wood, Friston, which should be incorporated into certain topics of the Projects’ CIA. In any event, the Councils note that in NGV’s response at Deadline 9 (REP9-062), it set out a typical footprint for a converter station (up to 5 ha) with a building of approximately 230m x 210m and a maximum height of 24m and stated that *“The nature of this type of linear infrastructure and associated technology means that there is early clarity on fixed project elements, these are unlikely to change except for refinements of parameters; project variability is related to siting and routeing and associated mitigations”*.
13. The Councils note the non-statutory guidance provided by the Planning Inspectorate in Advice Note 17, setting out a process that applicants *“may wish to adopt”* for CIA, but do not consider it justifies the approach taken by the Applicants. Whilst the division of projects into tiers is not, in itself, a concern, Advice Note 17 does not advise that projects in Tier 3 should be left unassessed. For Tier 3 projects it advises that *“the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a high level”* (paragraph 3.4.3). The Councils’ concern is that there are known future energy projects planned in the general vicinity, based on the offered grid connections, and it would be possible to undertake some form of assessment in relation to them for inclusion in the CIA.
14. Whilst the Councils acknowledge that no final decisions have yet been made on siting, it is reasonably foreseeable that if the Projects are consented so as to provide a NGET substation at Friston, that location will become a leading option for any further connections. The Councils consider that there is sufficient information already submitted to the Examinations about the spatial consequences of co-locating two further connections at Friston so as to allow for their inclusion in the CIA.
15. The Applicants wholly disagree with the Councils position. The Applicants set out their position regarding the selection of other proposed developments to be considered within CIAs remains as set out within **Applicant’s Comments on Relevant Representations, Volume 3: Technical Stakeholders** (AS-036). In



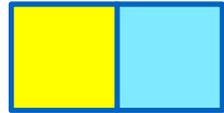
summary, the Applicants' approach follows Planning Inspectorate Advice Note 17 and identifies other proposed developments for CIA through the use of a three tier system, as follows:

- Tier 1: Projects under construction, permitted or submitted applications;
  - Tier 2: Projects on the Planning Inspectorate's Programme of Projects where a scoping report has been submitted; and
  - Tier 3: Projects on the Planning Inspectorate's Programme of Projects where a scoping report has not been submitted; projects identified in the relevant Development Plan (and emerging Development Plans); and projects identified in other plans and programmes (as appropriate) which set out the framework for future development consent.
16. Tier 1 and Tier 2 projects are included in all relevant CIAs within the Applications, while in line with Advice Note 17, Tier 3 projects have generally not been included. This is because the information available on Tier 3 projects at the time of the Applications was of inadequate detail to facilitate any meaningful assessment (e.g. no information on the project design or timescales). Tier 3 projects not considered in the CIAs within the Applications include the aforementioned Nautilus Interconnector, EuroLink Interconnector, North Falls and Five Estuaries.
17. The Applicants can confirm that there have been no major changes with regard to the planning status of these projects since the submission of the Applications.
18. All the projects are still to undertake EIA scoping and the Applicants consider that the Applications as submitted remain current in terms of having assessed projects for which consent is being sought or granted. Despite the Applicants' requests for further information on the location of the Nautilus and Eurolink infrastructure (necessary to undertake a CIA), NGV has confirmed that no such information is available (REP11-119). NGV's projects remain at the feasibility stage and there is not currently the necessary project detail available to enable a thorough and meaningful assessment of potential cumulative impacts. This includes no information on landfall or converter station locations, cable routes, or indeed confirmation of a grid connection location.
19. The Applicants have, to the extent possible with the information currently available, provided a consideration of the potential cumulative impacts of the Projects with all foreseeable developments. This is reflected in submissions made during the Examinations regarding changes to the Sizewell C DCO and Sizewell B planning applications (REP6-043 and REP8-075). To the extent that information is available, the Applicants have also considered potential cumulative



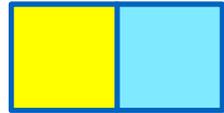
impacts associated with the hypothetical extension of the proposed National Grid substation north of Friston within the **National Grid Substation Extension Appraisal** submitted at Deadline 8 (REP8-074) and the associated appendices (REP8-069 to REP8-073). The Applicants consider that no further information has been made available by NGV since Deadline 8 to enable further appraisal of the hypothetical extension of the proposed National Grid substation.

20. In order to avoid duplication, and as it is not a topic specific issue, this outstanding matter is not discussed further in **Table 2.1**.

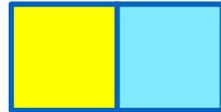


**Table 2.1 Summary of Onshore Topic Positions**

Topic	Summary
<b>Ground Conditions and Contamination</b>	
Relevant technical / statutory stakeholders	This topic has been considered with the Councils and the EA.
EIA	All matters relating to Existing Environment, Assessment Methodology and Assessment Conclusions have been agreed with the Councils and the EA.
Mitigation	All matters pertaining to Mitigation are agreed with the Councils and the EA.  The <b>Outline Code of Construction Practice</b> (Outline CoCP) (document reference 8.1) incorporates suitable mitigation measures for this topic.
DCO	All matters pertaining to the requirements of the DCO are agreed with the Councils and the EA.
<b>Summary</b>	All matters are agreed with the Councils and the EA.  See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.
<b>Land Use</b>	
Relevant technical / statutory stakeholders	This topic has been considered with the Councils.
EIA	All matters relating to Existing Environment and Assessment Methodology have been agreed with the Councils.



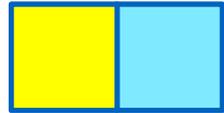
Topic	Summary
	<p>Regarding Assessment Conclusions, the Councils agree that the Applicants have minimised the impacts of the onshore substations to the best and most versatile land; however, they consider that National Grid has not undertaken the same design refinement at this stage in relation to the National Grid substation. The Applicants note that the National Grid substation will be subject to design refinement at the detailed design phase.</p>
Mitigation	<p>The Councils acknowledge the pre-consent work undertaken by the Applicants to reduce the footprint of the onshore substations, as well as the commitment to install the ducting for both Projects in-parallel should they be consented and built sequentially.</p> <p>The Councils do not agree that sufficient efforts or commitments have been made to minimise the footprint of the National Grid infrastructure to the maximum reasonable extent. The <b>Substations Design Principles Statement</b> (AS-133) includes the commitment that, 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.</p>
DCO	<p>All matters pertaining to the requirements of the DCO are agreed.</p>
<b>Summary</b>	<p>Existing Environment, Assessment Methodology, Mitigation and the DCO are agreed with the Councils. Regarding Assessment Conclusions, design refinement of the National Grid substation remains the one outstanding issue, although the <b>Substations Design Principles Statement</b> (AS-133) includes the commitment that the Applicants will seek to further reduce the visual extent of the National Grid substation and cable sealing end compounds through appropriate equipment procurement and layout considerations.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Onshore Ecology</b>	
Relevant technical / statutory stakeholders	<p>This topic has been considered with the Councils, NE and the EA.</p>



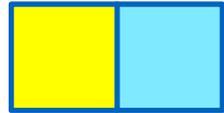
Topic	Summary
EIA / Habitat Regulations Assessment (HRA)	<p>All matters relating to Existing Environment and Assessment Methodology have been agreed with the Councils, NE and the EA. All Assessment Conclusions are agreed with the EA.</p> <p>All Assessment Conclusions are agreed with NE with the exception of one outstanding matter. Point 9 of NE's Risk and Issues Log submitted at Deadline 6 (REP6-119) makes reference to cumulative impacts with Sizewell C. However, the Applicants note that NE's comments made at Deadline 3 (REP3-119) on the <b>Sizewell C Cumulative Impact Assessment Note (Landscape and Visual)</b> (REP2-010) do not relate to onshore ecology and therefore consider that this matter is in fact closed.</p> <p>All Assessment Conclusions are agreed with the Councils with the exception that the growth rates assumed by the Applicants for new hedgerow planting are considered optimistic (see LA-02.13 and subsequent related items in the SoCG with the Councils (REP12-070). However, the Councils agree that the effective and robust implementation of adaptive management measures as set out in the <b>Outline Landscape and Ecological Management Strategy</b> (OLEMS) (document reference 8.7) will reduce the risk of failure and promote strong growth rates at Work Nos. 19, 24, 29 and 33 and will help achieve the assumed growth rates.</p> <p>Since Deadline 9 agreement has been reached with the Councils regarding operational noise effects on ecological receptors. The Applicants have included a commitment within the <b>Substations Design Principles Statement</b> (AS-133) to provide high frequency noise information (in 1/3 octave bands from 8kHz to 22kHz where such information is available from equipment suppliers). The <b>OLEMS</b> (document reference 8.7) also confirms that Work No. 29 has been identified to provide ecological mitigation primarily in relation to foraging and commuting bats. This will involve planting suitable species within the area to propagate a range of insects to encourage and sustain the area for us by foraging bats.</p> <p>It should also be noted that the Councils no longer defer to NE on air quality impacts on ecological receptors and agree with the Assessment Conclusions in this regard following the inclusion further measures within the <b>Outline CoCP</b> (document reference 8.1).</p>
Mitigation	<p>All matters pertaining to Mitigation are agreed with the EA.</p> <p>The Applicants have submitted a draft badger mitigation licence application to NE. NE has yet to issue the associated Letter of No Impediment (LoNI) and therefore agreement on mitigation for this species remains outstanding.</p> <p>Regarding great crested newt, NE previously agreed the level and type of survey data required for the Applications during an Expert Topic Group meeting on 20<sup>th</sup> February 2018. Through its Relevant Representation (RR-059), NE requested that a draft</p>



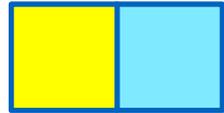
Topic	Summary
	<p>mitigation licence should be submitted to secure a LoNI . However, NE has now concluded that it cannot determine the draft mitigation licence application on this basis due to recent changes to NE’s process for issuing LoNI. The Applicants will therefore progress licensing for great crested newt post-consent based on the results of preconstruction surveys. This revised approach has been discussed with NE. The Applicants refer to NE’s risks and issues log (REP12-092), in which NE indicate they understand the Applicants will submit licence applications for Great Crested Newts (GCN) post-consent.</p> <p>There is an outstanding matter with the Councils regarding growth rates for new hedgerow planting. The Councils agree that the effective and robust implementation of adaptive management measures as set out in the <b>OLEMS</b> (document reference 8.7) will reduce the risk of failure and promote strong growth rates at Work Nos 19, 24, 29 and 33.</p> <p>It is agreed with the Councils, NE and the EA that the <b>OLEMS</b> (document reference 8.7), the <b>Outline Landfall Construction Method Statement</b> (REP12-025), the <b>Outline Watercourse Crossing Method Statement</b> (REP11-074), <b>Outline SPA Crossing Method Statement</b> (REP12-027) and the <b>Outline CoCP</b> (document reference 8.1)) incorporate suitable mitigation measures for this topic.</p>
DCO	<p>All matters pertaining to the Requirements of the DCO are agreed with the Councils, NE and the EA.</p> <p>Note that matters regarding the <b>Outline SPA Crossing Method Statement</b> (REP12-027) are dealt with under ‘Onshore Ornithology’.</p>
Summary	<p>All matters relating to Existing Environment and Assessment Methodology have been agreed with the Councils, NE and the EA.</p> <p>All Assessment Conclusions are agreed with the NE (noting point 9 of NE’s Risks and Issues log highlighted above) and EA; there is one outstanding matter with the Councils regarding Assessment Conclusions.</p> <p>All matters pertaining to Mitigation are agreed with the Councils excepting the Applicants’ assumed growth rates for new hedgerow planting, although the Councils agree that the adaptive management measures proposed at Work Nos 19, 24, 29 and 33 will help achieve the growth rates.</p> <p>All matters pertaining to the requirements of the DCO are agreed with the Councils, NE and the EA (N.B. Matters regarding the <b>Outline SPA Crossing Method Statement</b> (REP12-027) are dealt with under ‘Onshore Ornithology’).</p>



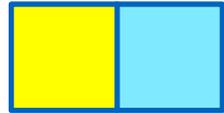
Topic	Summary
	See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.
<b>Onshore Ornithology</b>	
Relevant technical / statutory stakeholders	This topic has been considered with the Councils and NE.
EIA / HRA	All matters relating to Existing Environment, Assessment Methodology and Assessment Conclusions have been agreed with the Councils and NE.
Mitigation	<p>The Applicants' preferred construction method for crossing the Sandlings SPA is an open trench technique. Such an approach would reduce the footprint of, and timescales for the works when compared to a trenchless technique.</p> <p>The Councils' preferred construction method for crossing the Sandlings SPA is an open trench technique.</p> <p>The Applicants' <b>Outline SPA Crossing Method Statement</b> (REP12-027) includes commitments regarding the timing of compensatory habitat mitigation as agreed with NE. NE considers that a Requirement should be included within the DCO to ensure the proposed mitigation measures in the form of planting must be functioning prior to works commencing within the boundary of the SPA. The Applicants do not agree with this position. While NE's preferred construction method for crossing the Sandlings SPA is a trenchless technique, it agrees that an Adverse Effect on Integrity (AEoI) of the SPA is unlikely to result from an open trench technique (REP8-162).</p> <p>The <b>OLEMS</b> (document reference 8.7), the <b>Outline Landfall Construction Method Statement</b> (REP12-025), the <b>Outline Watercourse Crossing Method Statement</b> (REP11-074), <b>Outline SPA Crossing Method Statement</b> (REP12-027) and the <b>Outline CoCP</b> (document reference 8.1) contain the relevant mitigation measures for this topic.</p>
DCO	<p>All matters pertaining to the Requirements of the DCO are agreed with the Councils.</p> <p>An outstanding matter remains with NE regarding a seasonal restriction within the wording of Requirement 21 of the DCO and a new requirement securing the functioning of the mitigation within the SPA (see Mitigation above). The Applicants' position is that the seasonal restriction is already secured as it is committed to within the <b>Outline SPA Crossing Method Statement</b> (REP12-</p>



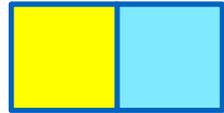
Topic	Summary
	<p>027). Requirement 21 of the <b>draft DCO</b> (document reference 3.1) stipulates that a final SPA Crossing Method Statement (which accords with the <b>Outline SPA Crossing Method Statement</b> (REP12-027)) must be submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body before works proceed. This includes a commitment to establish temporary ecological mitigation within Work No. 12A for nightingale and turtle dove prior to the start of construction of the SPA crossing where an open trench method is to be utilised. This is considered to be a sufficient mechanism for securing appropriate and proportionate mitigation for nightingale and turtle dove which are Site of Special Scientific Interest (SSSI) species.</p>
<b>Summary</b>	<p>All matters pertaining to Existing Environment, Assessment Methodology and Assessment Conclusions are agreed with the Councils and NE.</p> <p>All DCO matters are agreed with the Councils; there are two outstanding matters with NE regarding DCO wording.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Air Quality</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils.
EIA	<p>All matters relating to Existing Environment, Assessment Methodology and Assessment Conclusions have been agreed with the Councils.</p> <p>Since Deadline 9 agreement has been reached with the Councils in relation to the potential works at Marlesford Bridge. The <b>Outline CoCP</b> (document reference 8.1) now includes a commitment to undertake an air quality impact assessment of these works once they have been suitably confirmed / defined.</p>
Mitigation	The Applicants have committed to 70% of heavy goods vehicles (HGVs) adhering to Euro VI standards where construction of the Projects and Sizewell C overlap. The <b>Outline Construction Traffic Management Plan</b> (Outline CTMP) (document



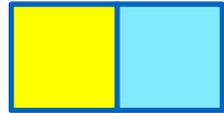
Topic	Summary
	<p>reference 8.9) provides clarification on the proposed monitoring arrangements for HGV emissions standards, as well as the controls that will be applied to vehicles not complying with Euro VI standards.</p> <p>All matters pertaining to Mitigation are agreed with the Councils.</p> <p>The <b>Outline CoCP</b> (document reference 8.1) contains the relevant mitigation measures for this topic.</p>
DCO	All matters pertaining to the DCO are agreed with the Councils.
<b>Summary</b>	<p>All matters regarding Existing Environment, Assessment Methodology, Mitigation, Assessment Conclusions and the DCO are agreed with the Councils.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Water Resources and Flood Risk</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils, East Suffolk IDB and the EA.
EIA	<p>All matters relating to Existing Environment, Assessment Methodology and Assessment Conclusions have been agreed with the EA and East Suffolk IDB. All matters relating to Existing Environment have been agreed with the Councils.</p> <p>With regard to Assessment Methodology and Assessment Conclusions, since Deadline 9 the Applicants have undertaken initial infiltration testing at the proposed locations of the sustainable drainage system (SuDS) basins for operation of the National Grid substation and onshore substations. Based on the test results (<b>Infiltration Test Results (May 2021)</b> (AS-129)), the Applicants and the Councils have agreed appropriate outline design parameters for the SuDS basins. Within the <b>Outline Operational Drainage Management Plan</b> (OODMP) (document reference ExA.AS-13.D13.V7) the Applicants now propose an attenuation only SuDS for the National Grid substation and a hybrid infiltration and attenuation SuDS for the onshore substations. The relevant Assessment Methodology and Assessment Conclusion items in the SoCG are agreed with the Councils (LA-05.08 and LA-05.10).</p>



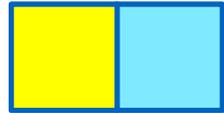
Topic	Summary
	<p>However, there remain some outstanding matters with regard to Assessment Methodology and Assessment Conclusions with the Councils. The Councils do not agree with the worst case flood risk and drainage scenario presented for the construction phase of the Projects. Since Deadline 9 the <b>Outline CoCP</b> (document reference 8.1) has been updated to include further details on an indicative construction drainage management scheme and how this could be accommodated within the Order limits. The indicative scheme is based on a 1 in 15 storm event return period for the National Grid infrastructure and onshore substations, and a 1 in 10 storm event return period for the cable route. However, the Councils do not agree with this approach and have stated that the scheme should be based on a 1 in 100 storm event return period to be used. The Applicants consider this to be impracticable and unnecessary; the measures proposed match the (non-mandatory) recommendations in industry guidance (Control of water pollution from linear construction projects (C649) (CIRIA, 2006)) for the onshore cable route.</p>
Mitigation	<p>All matters relating to Mitigation have been agreed with the EA and East Suffolk IDB.</p> <p>Following agreement between the Applicants and the Councils on the SuDS now proposed within the <b>OODMP</b> (document reference ExA.AS-13.D13.V7), the Councils now agree with the embedded mitigation proposed for operation of the National Grid substation and onshore substations (LA-05.20).</p> <p>Due to the outstanding matters regarding Assessment Methodology and Assessment Conclusions, the Councils have stated they are unable to agree construction phase Mitigation.</p>
DCO	<p>All matters pertaining to the DCO are agreed with the EA and East Suffolk IDB.</p> <p>All matters pertaining to the DCO are agreed with ESC, but one is not agreed with SCC. SCC has requested to be named as the discharging authority in respect of Requirement 41 (operational drainage management plan) rather than the relevant planning authority, while ESC has submitted that it should be the relevant planning authority that discharges the Requirement. The Applicants consider that the relevant planning authority should be the discharging authority. All other DCO matters are agreed with the Councils.</p>
Summary	<p>East Suffolk IDB and the EA agree on all matters relating to Existing Environment, Assessment Methodology, Assessment Conclusions, Mitigation and the DCO.</p>



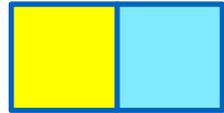
Topic	Summary
	<p>The Councils agree regarding the Existing Environment, but there remain outstanding matters relating to Assessment Methodology, Assessment Conclusions and Mitigation. However, since Deadline 9 agreement has been reached with the Councils on the SuDS proposed for operation of the National Grid substation and onshore substations.</p> <p>Regarding the DCO, there remains the matter of which Council should be named as the discharging authority in respect of Requirement 41.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Archaeology and Cultural Heritage – Unknown Heritage Assets</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils and HE.
EIA	<p>There remains an outstanding matter with the Councils and HE relating to the Existing Environment and the extent of pre-application trial trenching. The Councils agree that the archaeological surveys undertaken are appropriate, but suggest that further trial trenching is necessary to inform mitigation. Having agreed the scope with the Councils, the Applicants have commenced further pre-construction trial trenching which is anticipated to be completed in Summer 2021.</p> <p>All matters relating to the Assessment Methodology and Assessment Conclusions have been agreed with both the Councils and HE.</p>
Mitigation	All matters pertaining to Mitigation are agreed with both the Councils and HE.
DCO	All matters pertaining to the DCO are agreed with both the Councils and HE.
<b>Summary</b>	All matters pertaining to the Assessment Methodology, Assessment Conclusions, Mitigation and the DCO are agreed with the Councils and HE. Although there remains an outstanding matter with the Councils and HE relating to the Existing Environment and the extent of pre-application trial trenching, a resolution has been agreed and this is being delivered by the Applicants.



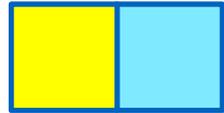
Topic	Summary
	See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.
<b>Archaeology and Cultural Heritage – Setting of Designated and Non-Designated Heritage Assets</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils and HE.
EIA	<p>Matters relating to the Existing Environment and Assessment Methodology are agreed with both HE and the Councils.</p> <p>There remain differences of opinion relating to the Assessment Conclusions. The Councils consider that the level of harm to Woodside Farm, High House Farm and the Church of St Mary will be higher than suggested by the Applicants and that the proposed mitigation would not reduce the level of harm. While the Applicants and HE agree that harm to the setting of St Marys Church will be in the less than substantial category, there is a difference of professional opinion regarding the level of harm within the category.</p>
Mitigation	<p>All matters regarding mitigation planting have been agreed with the Councils.</p> <p>HE has made representations regarding the possible impact of mitigation itself and issues regarding the effectiveness of planting (REP1-143). The Applicants note (see section 2.7, item 40 (REP2-016)) a trade-off between potential landscape and visual impacts and potential cultural heritage impacts at the onshore substation and National Grid locations through the mitigation planting associated with the implementation of a landscape management scheme. The Applicants consider that the planting proposals contained within the <b>OLEMS</b> (document reference 8.7) have had regard to the potential impacts upon both landscape and visual and cultural heritage receptors and represents an appropriate balanced approach to mitigation impacts for each of these receptors.</p>
DCO	All matters pertaining to the DCO are agreed with the Councils and HE.
<b>Summary</b>	All matters relating to the Existing Environment and Assessment Methodology are agreed with both HE and the Councils. There remain outstanding matters with the Councils regarding Assessment Conclusions and the level of harm to Woodside Farm, High



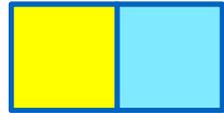
Topic	Summary
	<p>House Farm and the Church of St Mary. There remains an outstanding matter with HE regarding Assessment Conclusions and the level of harm to the Church of St Mary, however HE agrees that this harm will be in the less than substantial category, as outline in Historic England's Deadline 12 submission (REP12-086).</p> <p>The Councils agree with the proposed mitigation planting.</p> <p>All matters pertaining to the DCO are agreed with the Councils and HE.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Noise and Vibration – Construction</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils.
EIA	<p>All matters pertaining to the Existing Environment, Assessment Methodology and Assessment Conclusions are agreed with the Councils.</p> <p>The Applicants and the Councils note that the assessment represents a snapshot in time and the <b>Outline CoCP</b> (document reference 8.1) provides measures to ensure that significant adverse impacts will be avoided through the process of securing a Section 61 consent under the Control of Pollution Act 1974.</p>
Mitigation	<p>All matters pertaining to Mitigation are agreed with the Councils.</p> <p>The <b>Outline CoCP</b> (document reference 8.1) contains the relevant mitigation measures for this topic.</p>
DCO	All matters pertaining to the DCO are agreed with the Councils.
<b>Summary</b>	All matters pertaining to the EIA, Mitigation and DCO are agreed with the Councils.



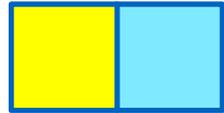
Topic	Summary
	See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.
<b>Noise and Vibration – Operation</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils.
EIA	<p>There remain a small number of outstanding matters regarding the Existing Environment, Assessment Methodology and Assessment Conclusions, mainly a difference of professional opinion in the establishment of the background sound levels and technical differences regarding the application of BS4142:2014 +A1:2019, resulting in differences of opinion on the level at which adverse operational impacts will occur.</p> <p>However, the Councils accept the maximum operational noise rating limits specified within Requirement 27 of the <b>draft DCO</b> (document reference 3.1). The Councils also welcomed the provisions within the updated <b>Substations Design Principles Statement</b> (AS-133) to adopt Best Practicable Means to reduce the limits further at the detailed design stage where commercially and practically viable (LA-08.15). The Councils therefore agree that <b>no significant adverse impacts</b> will result from operation of the Projects (LA-08.11).</p>
Mitigation	<p>Requirement 12 of the DCO and provisions in the <b>Substations Design Principles Statement</b> (AS-133) commit the Applicants to preparing and submitting an Operational Noise Design Report to the relevant planning authority for approval prior to construction of the onshore substations. Requirement 27 of the DCO stipulates the maximum operational noise rating levels to which the Projects' substations operating cumulatively with the National Grid substation must comply with.</p> <p>All matters pertaining to Mitigation are agreed with the Councils.</p>
DCO	All matters pertaining to the DCO are agreed with the Councils.
<b>Summary</b>	There remain a small number of outstanding matters regarding the Existing Environment, Assessment Methodology and Assessment Conclusions (mainly differences of professional opinion on the application of guidance). However, the Councils



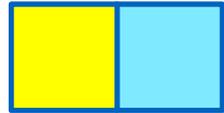
Topic	Summary
	<p>agree that the commitments made by the Applicants will ensure that <b>no significant adverse impacts</b> will occur. All matters pertaining to Mitigation and the DCO are agreed with the Councils.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Traffic and Transport</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils and Highways England.
EIA	All matters relating to Existing Environment, Assessment Methodology, and Assessment Conclusions are agreed with the Councils and Highways England.
Mitigation	<p>All matters relating to Mitigation are agreed with the Councils and Highways England.</p> <p>Wording agreed with SCC has been included within the <b>Outline CTMP</b> (document reference 8.9), <b>Outline Access Management Plan</b> (Outline AMP) (document reference 8.10) and <b>Outline Travel Plan</b> (document reference 8.11). On the basis of these inclusions, SCC has confirmed that protective provisions are not required.</p>
DCO	All matters pertaining to the DCO are agreed with the Councils and Highways England.
<b>Summary</b>	<p>All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions, Mitigation and the DCO are agreed with the Councils and Highways England.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Human Health</b>	



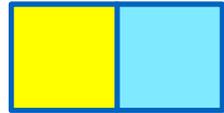
Topic	Summary
Relevant technical / statutory stakeholders	This topic was considered with the Councils. Public Health England (PHE) was also consulted but did not take an active part in the Examination process.
EIA	<p>PHE has stated that “<i>we acknowledge that the Environmental Statement (ES) has not identified any issues that could significantly affect public health. We are satisfied that the wider determinants of health have been adequately assessed, using a suitable methodology</i>” (RR-064).</p> <p>Regarding the Existing Environment, Assessment Methodology and Assessment Conclusions, there are outstanding matters with the Councils relating to the specific air quality and noise assessments. However, the Applicants note that all matters within the Air Quality and the Noise and Vibration – Construction SoCGs are agreed with the Councils. Additionally, the Councils accept the maximum operational noise rating limits specified within Requirement 27 of the <b>draft DCO</b> (document reference 3.1). The Councils also welcomed the provisions within the updated <b>Substations Design Principles Statement</b> (AS-133) to adopt Best Practicable Means to reduce the limits further at the detailed design stage where commercially and practically viable (LA-08.15). The Councils therefore agree that <b>no significant adverse noise impacts</b> will result from operation of the Projects (LA-08.11).</p>
Mitigation	Mitigation pertaining to traffic and transport, air quality, noise, public rights of way (PRoW) and electromagnetic frequency (EMF) are agreed. The Councils agreed at Issue Specific Hearing (ISH) 10 that the Applicants’ track record in community liaison is strong.
DCO	All matters pertaining to the DCO have been agreed with the Councils.
<b>Summary</b>	<p>The Councils have minor outstanding EIA matters around the specific air quality and noise assessments. All other EIA matters are agreed with the Councils. All matters pertaining to Mitigation and the DCO have been agreed with the Councils.</p> <p>See <b>section 2.1</b> regarding the Councils’ position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Offshore Seascape, Landscape and Visual Amenity</b>	



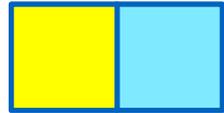
Topic	Summary
Relevant technical / statutory stakeholders	This topic was considered with the Councils, AONB Partnership and NE. The AONB Partnership have deferred technical comment to NE.
EIA	<p>All matters regarding Existing Environment and Assessment Methodology are agreed with the Councils and NE.</p> <p>Regarding Assessment Conclusions, the Councils deferred to NE regarding the sensitivity and importance of certain features within the receiving environment. The status of agreement and outstanding matters can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• The Applicants are agreed with the Councils and NE that the East Anglia ONE North project will not have an effect on the statutory purposes of the Suffolk Coasts and Heaths AONB (SCHAONB).</li> <li>• The Applicants are agreed with the Councils and NE that the night-time effects of the East Anglia TWO project will not have an effect on the statutory purposes of the SCHAONB.</li> <li>• NE considers that day-time effects of the East Anglia TWO project undermines the statutory purpose of the SCHAONB. The Applicants consider that while there are significant effects (in EIA terms), these do not translate into undermining the statutory purpose of the SCHAONB.</li> <li>• The Councils consider that the Special Qualities of the SCHAONB have not been accurately assessed. The Applicants consider that they were accurately assessed in <b>Chapter 28</b> of the ES (APP-076) and that further consideration with a focus on policy is included within the <b>Applicants' submission on the Effects with Regard to the Statutory Purposes of the Suffolk Coasts and Heaths AONB and Accordance with NPS Policy</b> (REP2-008).</li> </ul> <p>The Applicants submitted an additional assessment taking account of the Sizewell C material changes at Deadline 8 (REP8-075); this predicts only localised significant effects during construction. NE had no comments on this assessment (REP9-063).</p>
Mitigation	<p>The Councils note that the ES does not propose any monitoring. The Councils believe monitoring is important given the extent and scope of the net zero challenge by 2050 and the amount of wind turbines potentially being built. There is a need to monitor and verify the assessment conclusions and the effectiveness of mitigation to inform the design of future Projects.</p> <p>The Applicants do not consider it necessary to undertake monitoring of the SLVIA effects during operation of the Projects. The Applicants note that, with the exception of the Five Estuaries and North Falls projects, no further offshore wind farms are planned for this region at the current time.</p>



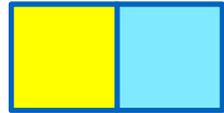
Topic	Summary
	<p>The Councils support NE's view that insufficient embedded mitigation has been included within the design of East Anglia TWO.</p> <p>The Applicants note that the principal outstanding matter with NE in terms of the design of East Anglia TWO is the effect resulting from the height of the turbines (300m at the time of the Applications) representing the worst case scenario. However, the Applicants note that NE recognises the embedded mitigation that the revised design presents, that the revised layout design has added some embedded mitigation in the form of reduced lateral spread and avoidance of the 'curtaining' effect with East Anglia ONE North, which occurred with the Preliminary Environmental Information Report layout. The Applicants have also committed to a reduced turbine tip height of 282m.</p> <p>No mitigation is proposed or has been requested for East Anglia ONE North. The Applicants note they have entered into a Section 111 Agreement with ESC which will include funds for measures to support access, environmental and ecological enhancements to the SCHAONB.</p>
DCO	All matters pertaining to the DCO are agreed with the Councils; NE has not provided comment.
<b>Summary East Anglia TWO</b>	<p>All matters regarding Existing Environment agreed with the Councils and NE. Regarding other matters, there remain fundamental differences of professional opinion between the Applicants and the Councils and NE.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Summary East Anglia ONE North</b>	<p>All matters pertaining to the Existing Environment, Assessment Methodology, Mitigation and the DCO are agreed with the Councils and NE. Assessment Conclusions are agreed with NE, however the Councils consider that the Special Qualities of the SCHAONB have not been accurately assessed; the Applicants consider an accurate assessment is included within APP-076 and REP2-008.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Landscape and Visual</b>	



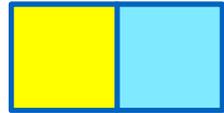
Topic	Summary
Relevant technical / statutory stakeholders	This topic was considered with the Councils, the AONB Partnership and NE. The AONB Partnership have deferred technical comment to NE.
EIA	<p>NE considers that agreement has been reached on statements in relation to the Existing Environment, Assessment Methodology and Assessment Conclusions. Assessment Conclusions are agreed with the Councils.</p> <p>Regarding the Existing Environment and Assessment Methodology, the Councils do not agree that the characterisation of the baseline landscape takes adequate account of key historic landscape features. The Applicants consider that the ES (<b>section 29.5.2 of Chapter 29</b> (APP-077) and <b>section 29.3.1 of Appendix 29.3</b> (APP-567)) appropriately characterises the baseline environment in terms of landscape character. The Applicants have also submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> (REP1-021) which provides further consideration of historic characteristics of the landscape.</p>
Mitigation	<p>The Councils welcome the Applicants' efforts to reduce the scale of the onshore substations; however, they consider that National Grid has not undertaken the same design refinement at this stage in relation to the National Grid substation. The <b>Substations Design Principles Statement</b> (AS-133) includes the commitment that, 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.</p> <p>In line with their submission at Deadline 6 (REP6-077), the Councils also request an additional design principle to ensure the design will have regard to opportunities arising from emerging new technologies and changes to legislation and regulations. However, the Applicants' position is that it is not considered feasible for alternative technologies to be brought forward on a commercial and technically sound basis within the timescales of the Projects, and in any event the Applicants can only develop the Projects in line with the parameters assessed within the Applications.</p> <p>The relevant mitigation measures for this topic are set out within <b>Chapter 29 Landscape and Visual Impact Assessment</b> of the ES (APP-077) and the <b>OLEMS</b> (document reference 8.7). The <b>Substations Design Principles Statement</b> (AS-133) provides a sound basis for the further development of the substation design.</p>
DCO	All matters pertaining to the DCO are agreed by both NE and the Councils.



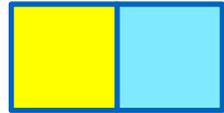
Topic	Summary
<b>Summary</b>	<p>NE agrees regarding the Existing Environment, Assessment Methodology and Assessment Conclusions. The Councils agree regarding the Assessment Conclusions, but there remains one outstanding matter regarding the Existing Environment and Assessment Methodology.</p> <p>All matters pertaining to Mitigation are agreed with NE. There remains an outstanding Mitigation matter with the Councils.</p> <p>All matters pertaining to the DCO and agreed with the Councils and NE.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Tourism</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils.
EIA	<p>There is an outstanding matter regarding the Existing Environment, Assessment Methodology and Assessment Conclusions. The Councils consider that the Applicants should have undertaken a visitor perception study, however the Applicants consider that this was not necessary given the scale of the Projects.</p> <p>The Councils agree with the conclusions of the Destination Management Organisation (DMO) Report; however the Applicants consider that while the DMO Report provides useful context on visitor motivation, it cannot be used to extrapolate economic effects. In addition, the conclusions of the DMO Report relate to the cumulative case with Sizewell C, not the Projects (either alone or together) and so it cannot be used when considering Projects in isolation.</p>
Mitigation	The Councils have requested provision of a Tourism Fund. It is the Applicants' view that the Projects will not have significant impacts upon visitor perception during construction as they are not iconic projects likely to be in the public mind and direct impacts which could affect visitors already present in the area will be mitigated to not significant levels. Notwithstanding this position, the Applicants have committed to a Tourism Fund.
DCO	Matters pertaining to the DCO are not considered relevant to this topic.



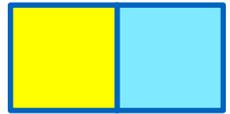
Topic	Summary
<b>Summary</b>	<p>Fundamental differences remain between the Applicants and the Councils.</p> <p>However, it should be noted that the Applicants have committed to a Tourism Fund.</p> <p>Matters pertaining to the DCO are not considered relevant to this topic.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Recreation (Public Rights of Way)</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils.
EIA	<p>Certain matters relating to the Existing Environment, Assessment Methodology and Assessment Conclusions remain outstanding.</p> <p>The Councils consider that access and amenity should be assessed as an EIA topic in its own right rather than divided across different topics as it is within the Applications, and also that such an assessment should consider potential impacts on both the physical resource of a PRoW and on the quality of the experience that members of the public have when using it (e.g. changes to views, noise pollution, air pollution, disturbance from construction traffic, loss of historical context and tranquillity).</p> <p>The Applicants undertook an assessment of access and amenity in line with standard EIA practice at the time and previous assessments (such as those undertaken for East Anglia ONE and East Anglia THREE). The Applicants have submitted a <b>Public Rights of Way Clarification Note</b> (REP1-049) to the Examinations to assist the Councils and other stakeholders. This provides an overview of the assessment method used and a summary of the potential impacts considered for PRoWs, signposting information within the Applications.</p>
Mitigation	All matters pertaining to Mitigation, as well as other matters (e.g. funding for inspections, the CoCP and fencing) are agreed with the Councils. The Councils broadly accept the principles in the <b>Outline PRoW Strategy</b> (document reference 8.4) for the



Topic	Summary
	<p>management of the temporary closures; these will be taken forward to the final PRow Strategy as per Requirement 32 of the <b>draft DCO</b> (document reference 3.1).</p> <p>The <b>Outline CoCP</b> (document reference 8.1) and the <b>Outline PRow Strategy</b> (document reference 8.4) contain the relevant mitigation measures for this topic.</p>
DCO	All matters pertaining to the DCO are agreed with the Councils.
<b>Summary</b>	<p>Although certain EIA matters remain outstanding, the Applicants have submitted <b>Public Rights of Way Clarification Note</b> (REP1-049) to the Examinations and do not intend to provide any further EIA updates regarding the topic. All matters pertaining to Mitigation are agreed with the Councils. All matters regarding the DCO are agreed with the Councils.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>
<b>Socio-Economics</b>	
Relevant technical / statutory stakeholders	This topic was considered with the Councils.
EIA	All matters relating to Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation have been agreed with the Councils.
Mitigation	<p>All matters relating to Mitigation have been agreed with the Councils.</p> <p>Additionally, matters pertaining to an Employment and Skills Memorandum of Understanding and the East Anglia Hub have been agreed.</p>
DCO	Matters pertaining to the DCO are not considered relevant to this topic.

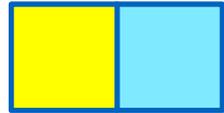


Topic	Summary
<b>Summary</b>	<p>All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions are agreed with the Councils.</p> <p>Matters pertaining to the DCO are not considered relevant to this topic.</p> <p>See <b>section 2.1</b> regarding the Councils' position on CIA with regard to future renewable energy and transmission projects within the vicinity of the Projects.</p>



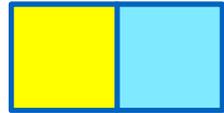
### 3 Summary of Offshore Topic Positions

21. **Table 3.1** provides status summaries for each of the offshore EIA topics. It reviews the EIA topics as set out in the relevant SoCGs to highlight areas of agreement and any outstanding matters with the technical stakeholders (i.e. the regulators or statutory advisors with the relevant technical competence).

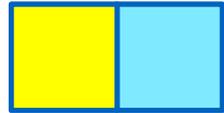


**Table 3.1 Summary of Offshore Topic Positions**

Topic	Summary
<b>Marine Geology, Oceanography and Physical Processes</b>	
Relevant technical / statutory stakeholders	This topic was considered with NE and the MMO.
EIA	All matters are agreed with NE and the MMO.
Mitigation	All matters are agreed with NE and the MMO.
DCO	All matters are agreed noting that Condition 24 of the Generation Deemed Marine Licence (DML) and Condition 20 of the Transmission DML regarding scour protection and cable protection during operation are agreed on a without prejudice basis as NE and the MMO consider that a separate marine licence for any additional cable or scour protection is required.
<b>Summary</b>	All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions and the DCO are agreed with NE and the MMO.
<b>Marine Water and Sediment Quality</b>	
Relevant technical / statutory stakeholders	This topic was considered with NE and the MMO.
EIA	All matters are agreed with NE and the MMO.
Mitigation	All matters are agreed with NE and the MMO.
DCO	All matters are agreed with NE.  All matters are agreed with the MMO on basis of sediment sampling condition 30 of the Generation DML and Condition 26 of the Transmission DML.

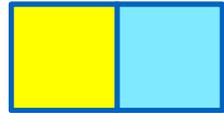


Topic	Summary
Summary	All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions and the DCO are agreed with NE and the MMO
<b>Benthic Ecology</b>	
Relevant technical / statutory stakeholders	This topic was considered with NE, the MMO and EIFCA.
EIA	<p>All matters are agreed with NE and the MMO.</p> <p>EIFCA do not agree with the findings of the cumulative assessment in that they do not consider that the scale of offshore development in the southern North Sea has been fully considered in the CIA. EIFCA consider the assessment of cumulative impacts for the Projects should be enhanced by a regional study to examine potential overall impacts of offshore activities including windfarm related works, aggregate extraction and demersal fishing on benthic ecology in the southern North Sea, which is consistent with their advice on other windfarm projects.</p> <p>The Applicants position is that such regional-scale studies are beyond the scope of the Projects and would be better suited through programmes such as the Department for Business, Energy and Industrial Strategy (BEIS) Strategic Environmental Assessment (SEA) Research Programme, the MMO or The Crown Estate Enabling Actions Programme. The Applicants' parent company, ScottishPower Renewables has a clear track record of supporting and contributing to such strategic studies.</p>
Mitigation	<p>All matters are agreed except the following :</p> <ul style="list-style-type: none"> <li>The Outline Offshore Operations and Maintenance Plan (document 8.12) is agreed with the MMO and NE with the exception the placement of scour protection and cable protection during operation. This is the subject of the without prejudice wording of scour protection and cable protection during operation.</li> </ul> <p>Note that previous disagreement with NE over the <b>Outline Sabellaria Reef Management Plan</b> (REP6-039) has been resolved (see response 3.2.25 in Appendix K9 to the <b>Natural England Deadline 11 Submission - Natural England's Response to ExA Questions (ExQ3)</b> (REP11-123)).</p>

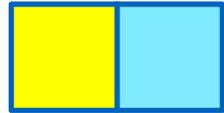


Topic	Summary
DCO	Agreed noting that Condition 24 of the Generation DML and Condition 20 of the Transmission DML regarding scour protection and cable protection during operation are agreed on a without prejudice basis as NE and the MMO consider that a separate marine licence for any additional cable or scour protection is required.
<b>Summary</b>	All matters pertaining to the assessment are agreed, with the exception of the EIFCA's views on cumulative assessment (which are not shared with NE or the MMO). All matters pertaining to the management and mitigation of effects are agreed with the exception of the placement of scour protection and cable protection during operation, for which without prejudice wording for Condition 24 of the Generation DML and Condition 20 of the Transmission DML has been provided.
<b>Fish and Shellfish Ecology</b>	
Relevant technical / statutory stakeholders	This topic was considered with NE, the MMO and the EIFCA.
EIA	All matters are agreed with NE, the MMO and the EIFCA.
Mitigation	All matters are agreed with the MMO and EIFCA.  NE consider the minimum burial depth should be 1.5m however the Applicants, in line with current best practice and engineering limitation as described in BERR (2008) <sup>1</sup> have committed to a minimum burial depth of 1m noting that the likely burial depth across the entirety of the cable routes will be between 1 and 3m. NE disagrees as a point of principle, but acknowledges the Applicants' position. All matters are agreed with NE.
DCO	All matters are agreed with NE, EIFCA and the MMO.  Note that previous disagreement with the MMO over the wording of the condition for the herring spawning seasonal restriction has been resolved and the Applicants and the MMO have agreed revised DML condition wording (see the <b>draft DCO</b> submitted at Deadline 12 (document reference 3.1)).

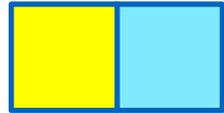
<sup>1</sup> BERR (2008). Review of Cabling Techniques and Environmental Effects applicable to the Offshore Windfarm Industry



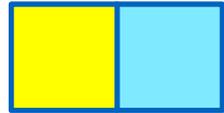
Topic	Summary
<b>Summary</b>	All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions and the DCO are agreed with NE, EIFCA and the MMO
<b>Marine Mammals</b>	
Relevant technical / statutory stakeholders	This topic was considered with NE and the MMO. The MMO defer HRA matters to NE.
EIA	All matters are agreed with NE and the MMO.  Note that previous disagreement with the MMO over the assessment of sequential piling within a 24 hour period has been resolved following the submission of the <b>Underwater Noise Modelling Update</b> (REP11-045) as confirmed by the MMO (see <b>Deadline 11 Submission – MMO Written Response</b> (REP11-114)).
Mitigation	All matters are agreed with NE and MMO.
Information to Support Appropriate Assessment Report / HRA	All matters are agreed with NE except mitigation which is 'on hold pending outcome of regulator (MMO) decision on process for managing multiple Site Integrity Plans (SIP). This relates to NE concerns surrounding the lack of a mechanism being in place to manage multiple SIPs from multiple projects within the Southern North Sea (SNS) Special Area of Conservation (SAC) and as such is outwith the Applicants control.  The MMO is content that the SIP is the correct process to manage in combination effects with other projects. The MMO believes this mechanism allows review of ongoing other noisy activities at the time of construction to ensure all activities are within the conservation objectives / guidance.  The MMO is confident that this mechanism will enable activities with minimal harm to the environment.  The Applicants highlight that the SIP is now the recognised framework by which in-combination effects will be managed in the Southern North Sea SAC, having been agreed for the consent of East Anglia THREE in 2017 and various other DCOs subsequently.
DCO	All matters are agreed with NE and MMO.



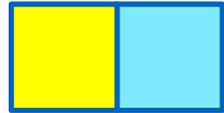
Topic	Summary
<p><b>Summary</b></p>	<p>All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions and the DCO are agreed with NE and the MMO. The only outstanding matter being NE’s concerns surrounding the lack of a mechanism being in place to manage multiple SIPs from multiple projects.</p>
<p><b>Offshore Ornithology</b></p>	
<p>Relevant technical / statutory stakeholders</p>	<p>This topic was considered with NE and the MMO. The MMO defer HRA matters to NE.</p>
<p>EIA</p>	<p>All matters are agreed with NE except the following which are not agreed:</p> <ul style="list-style-type: none"> <li>• Conclusions for cumulative collision risk for kittiwake, gannet, lesser black-backed gull (LBBG) and great black-backed gull (GBBG);</li> <li>• Conclusions for cumulative displacement for guillemot, razorbill, gannet and red throated diver (RTD); and</li> <li>• Conclusions for cumulative collision risk plus displacement for gannet.</li> </ul> <p>Note that based upon <i>Natural England’s Appendix A16c to the Natural England Deadline 12 Submission</i> REP12-090), NE now conclude that there would be no significant effect on LBBG or gannet (displacement) for projects consented or in determination. NE are unable to rule out significant effects if the Hornsea 4 project, and Sheringham and Dudgeon Extension Projects (SEP and DEP) are included.</p>
<p>Information to Support Appropriate Assessment Report / HRA</p>	<p>All matters are agreed with NE except the following which are not agreed:</p> <ul style="list-style-type: none"> <li>• Conclusion of no AEol on the RTD qualifying feature of the Outer Thames Estuary (OTE) SPA at the project alone level for East Anglia ONE North on the basis of displacement;</li> <li>• The methods for determining AEol on RTD;</li> <li>• Extent of OTE SPA buffer mitigation; and</li> <li>• Conclusion of no AEol at the in-combination level for the following sites and species:                             <ul style="list-style-type: none"> <li>○ LBBG qualifying feature of the Alde-Ore Estuary SPA on the basis of collisions.</li> </ul> </li> </ul>



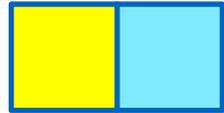
Topic	Summary
	<ul style="list-style-type: none"> <li>○ Kittiwake qualifying feature of the Flamborough and Filey Coast (FFC) SPA on the basis of collisions.</li> <li>○ Gannet qualifying feature of the FFC SPA on the basis of collisions.</li> <li>○ Guillemot qualifying feature of the FFC SPA on the basis of displacement.</li> <li>○ Razorbill qualifying feature of the FFC SPA on the basis of displacement.</li> <li>○ Seabird assemblage feature of the FFC SPA on the basis of impacts to the qualifying features listed above.</li> <li>○ RTD qualifying feature of the OTE SPA on the basis of displacement (both projects).</li> </ul> <p>Note that based upon <b>Natural England's Appendix A16c to the Natural England Deadline 12 Submission</b> (REP12-090), NE now conclude that there would be no AEOI for gannet (all effects), razorbill and guillemot for projects consented or in determination. NE are unable to rule out AEOI if the Hornsea 4 project and SEP and DEP are included.</p>
Mitigation, compensation and management	<p>NE recognise that the draught height increase presented reduces the impact. NE consider that further draught height increases could be achieved and would further reduce the impact, but NE acknowledges the Applicants' view that this will affect project viability.</p> <p>Regarding displacement of red-throated divers in the OTE SPA, NE advises that the 2km buffer at East Anglia ONE North does not mitigate for the likely extent of displacement effects to an acceptable level that would avoid a project-alone AEOI.</p> <p>The Applicants consider that all viable mitigations have been applied in terms of both draught height and the buffer to the OTE SPA, as discussed in <b>section 4 Alternative Solutions</b> of the <b>Habitat Regulations Assessment Derogation Case</b> (REP12-059).</p> <p>The Applicants have provided without prejudice compensation measures in relation to six features where there is disagreement over AEOI conclusions (REP12-060). The Applicants continue to engage with NE and the Department for Environment Food &amp; Rural Affairs (DEFRA) on these measures. The Applicants note that based upon <b>Natural England's Appendix A16c to the Natural England Deadline 12 Submission</b> (REP12-090), NE now conclude that there would be no AEOI for gannet (all effects), razorbill and guillemot for projects consented or in determination. NE are unable to rule out AEOI if the Hornsea 4 project and SEP and DEP are included, therefore compensation measures for these three species would not be necessary based on projects consented or in determination.</p>
DCO	Agreed with NE.



Topic	Summary
	Not agreed with the MMO who requested inclusion of a consultation period in Schedule 18. The Applicants do not consider this level of detail is appropriate in the Schedule (see Row MMO-609 of the SoCG).
<b>Summary (all species excluding RTD)</b>	<p>The Applicants and NE disagree on the conclusions of the in-combination assessment conclusions of the HRA and cumulative conclusions of the EIA. The Applicants have used a ‘common currency’ approach to the numbers and therefore consider that any outstanding methodological disagreements are not material. The remaining disagreements relate to concerns at an industry-wide level and are not unique to the Projects.</p> <p>The Applicants continue to engage with NE and DEFRA on the without prejudice compensation measures.</p>
<b>Summary (RTD)</b>	<p>Fundamental differences remain between the Applicants and NE on the assessment.</p> <p>The Applicants continue to engage with NE and DEFRA on the without prejudice compensation measures.</p>
<b>Commercial Fisheries</b>	
Relevant technical / statutory stakeholders	This topic was considered with the MMO and the EIFCA.
EIA	<p>All matters are agreed with the MMO.</p> <p>All matters except cumulative assessment conclusions are agreed with EIFCA. EIFCA have raised concerns about the scale of offshore development in the Southern North Sea and EIFCA do not feel these have been fully considered in the CIA. EIFCA consider the assessment of cumulative impacts for the Projects should be enhanced by a regional study to examine potential overall impacts of offshore activities including windfarm related works, aggregate extraction and demersal fishing on inshore fishing activities in the Southern North Sea which is consistent with EIFCA advice for other offshore windfarm projects.</p> <p>The Applicants acknowledged the increasing concern regarding potential cumulative impact of offshore windfarms and other activities including oil and gas and conservation (such as Marine Conservation Zones) on commercial fishing and note that the assessment concluded that the potential impact on some individuals within the ‘inshore fleet’ could be ‘moderate adverse’ (<b>section 13.7.2.2.3 of Chapter 13 Commercial Fisheries</b>). As a result, it was highlighted that mitigation would be discussed through the Commercial Fisheries Working Group.</p>



Topic	Summary
	The Applicants are of the view that such regional-scale studies are beyond the scope of the Projects and would be better suited through programmes such as the BEIS SEA Research Programme, the MMO or The Crown Estate Enabling Actions Programme. The Applicants' parent company, ScottishPower Renewables has a clear track record of supporting and contributing to such strategic studies.
Mitigation	All matters are agreed with the MMO and the EIFCA.
DCO	All matters are agreed with the MMO and the EIFCA.
<b>Summary</b>	All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions and the DCO are agreed with NE, EIFCA and the MMO (with the exception of the EIFCA's views on cumulative assessment which are not shared with NE or the MMO).
<b>Shipping and Navigation</b>	
Relevant technical / statutory stakeholders	This topic was considered with the MCA and Trinity House.
EIA	All matters are agreed with the MCA and Trinity House.
Mitigation	All matters are agreed with the MCA and Trinity House.
DCO	All matters are agreed with the MCA and Trinity House.
<b>Summary</b>	All matters pertaining to the Existing Environment, Assessment Methodology, Assessment Conclusions and the DCO are agreed with the MCA and Trinity House
<b>Civil and Military Aviation and Radar</b>	
Relevant technical / statutory stakeholders	This topic was considered with the MoD, CAA and NATS.



Topic	Summary
EIA	All matters are agreed with the MoD, CAA and NATS.
Mitigation	All matters are agreed with the MoD, CAA and NATS.
DCO	All matters are agreed with the MoD, CAA and NATS.
<b>Summary</b>	All matters pertaining to the assessment, mitigation and the DCO are agreed with MoD, CAA and NATS
<b>Marine Archaeology and Cultural Heritage</b>	
Relevant technical / statutory stakeholders	This topic was considered with the MMO and HE.
EIA	All matters are agreed with the MMO and HE.
Mitigation	All matters are agreed with the MMO and HE.
DCO	All matters are agreed with the MMO and HE.
<b>Summary</b>	All matters pertaining to the assessment, mitigation and the DCO are agreed with the MMO and HE
<b>Infrastructure and Other Users</b>	
Relevant technical / statutory stakeholders	This topic was considered with the MMO.
EIA	All matters are agreed with MMO.
Mitigation	All matters are agreed with MMO.
DCO	Agreed with the MMO.

## Deadline 13 Topic Position Statements

5<sup>th</sup> July 2021



Topic	Summary
	Note that the Applicants have also agreed SoCGs with East Anglia ONE Limited, East Anglia THREE Limited, Interconnector UK Limited, Diamond Transmission Partners, Galloper Limited, Greater Gabbard OFTO Plc and have agreed protective provisions with Sizewell B and Sizewell C.
<b>Summary</b>	All matters pertaining to the assessment, mitigation and the DCO are agreed with the MMO