



Gareth Leigh
Head of Energy Infrastructure Planning
Department for Business, Energy & Industrial
Strategy

EastAngliaOneNorth@planninginspectorate.gov.uk
EastAngliaTwo@planninginspectorate.gov.uk

Date: 29 November 2021
Your Reference: EN010077 & EN01078
Our Ref: EA1N – 20023870/EA2 - 20023871
Enquiries to: Naomi Goold



Dear Gareth Leigh,

Information/update request – Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Applications by East Anglia One North Limited and East Anglia Two Limited for Orders granting Development Consent for the proposed East Anglia One North and East Anglia Two Offshore Wind Farms and associated offshore and onshore infrastructure.

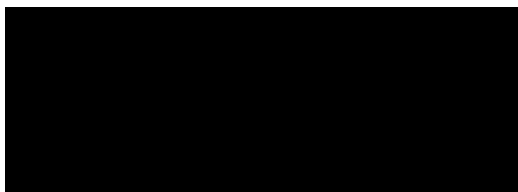
I am writing in response to the letters published on 2 November 2021 in relation to the East Anglia One North and East Anglia Two Offshore Windfarm projects. The letters seek additional information and/or updates as appropriate from Interested Parties in relation to point 3 i and ii (flood risk), point 6 (offshore ornithology), and specifically from East Suffolk Council in relation to point 7 i, ii, and iii (key documents to be certified). The other matters identified within the letters make specific requests of other statutory consultees or the Applicants and therefore East Suffolk Council will not be providing comment on these.

Please accept this letter and the responses provided within Appendix 1 of this document, as East Suffolk Council's response to the requests published on 2 November 2021 for both projects.

In addition to responding to the matters outlined within the letters, East Suffolk Council has also provided a copy of a letter received from National Grid Electricity System Operator (NG-ESO) for your information in Appendix 2.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,



Philip Ridley BSc (Hons) MRTPI
Head of Planning and Coastal Management
East Suffolk Council

Appendix 1 – Table providing East Suffolk Council’s comments in response to Secretary of States letter of 2 November 2021

Secretary of State’s Letters 2 November 2021	East Suffolk Council’s (ESC) Comments
Flood Risk – Point 3	
<p><i>i. The Secretary of State notes that in July 2021 the National Planning Policy Framework was updated and in particular at paragraph 159 onwards in relation to flood risk assessment. The Applicant and Interested Parties are invited to provide any comments they may have in light of these changes;</i></p>	<p>The National Planning Policy Framework (NPPF) published in July 2021 did not make significant changes to the text in ‘Planning and flood risk’ section of the 2019 version but did update the wording in a few important ways.</p> <p>Firstly, it was stated that plans should take account of <i>all sources of flood risk</i> (paragraph 161), this reinforces the need to robustly consider flood risk from all sources including those which have previously received less attention, for example surface water flooding. Secondly, plans should manage residual flood risk by using opportunities provided by development to improve green and other infrastructure to reduce the causes and impacts of flooding (paragraph 161). This supports and encourages the use and integration of natural management techniques and green infrastructure within the design of the development. It also further emphasises the need to build into project design flood resilience and flood resistance construction. Thirdly, emphasis has been added to the need for development in areas at risk of flooding to be flood resistant and resilient, <i>such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment</i> (paragraph 167).</p> <p>Of the three main changes, although all are relevant, one has the potential to have important implications for the projects. The reference within the NPPF to <i>all sources of flooding</i>, potentially now means the Applicant is required to pass a Sequential Test and if necessary, an Exception Test. It is however acknowledged that the Planning Practice Guidance on this matter has not yet been amended and this remains predicated on flood zones, it is therefore unclear as to how the tests should be applied.</p>

<p><i>ii. The Applicant and Interested Parties are invited to comment on the implications of the Environment Agency's 20 July 2021 update on climate change allowances for Flood Risk Assessment which updated peak river flow allowances and changed the guidance on how to apply these;</i></p>		<p>East Suffolk Council has no comments and will defer to the Environment Agency.</p>
<p>Offshore Ornithology – Point 6</p>		
<p>Natural England, RSPB and Interested Parties are requested to provide comments on the current Offshore Ornithology Cumulative and In Combination Collision Risk and Displacement Update submitted at the end of the Examination.</p> <p>The Secretary of State notes that at the end of the Examination there were minor discrepancies in the in-combination mortalities predicted for herring gull, greater blackbacked gull and gannet; however, these are unlikely to make a material difference to the conclusions of the assessment.</p>		<p>East Suffolk Council has no comments and will defer to Natural England and the RSPB.</p>
<p>Key Documents to be Certified – Point 7</p>		
<p>Outline Code of Construction Practice: East Suffolk Council are asked to comment on matters in relation to water quality and flood measures; Suffolk County Council are asked to comment on flood measures.</p>		<p>ESC has no comments to make on water quality and defers to the Lead Local Flood Authority and comments contained within the signed Statement of Common Ground submitted at Deadline 12 in relation to flood measures.</p>
<p>Outline Landscape and Ecological Management Strategy: Natural England, East Suffolk Council, and Suffolk County Council.</p>		<p>ESC notes the confirmation in paragraph 145 (REP13-007) that tree and shrub planting will not be planted within 5m of the footprint of the drainage basins, and confirmation in paragraph 200 that trees along the western bank</p>

		<p>of the River Hundred (extending 5m in land) which fall outside the area which the onshore cables are to be installed but within the cable corridor will not be removed unless for safety reasons. These revisions to the document are welcomed and ESC has no further comments to make on the changes made to the document at Deadline 13.</p>
<p>Outline Operational Drainage Management Plan: East Suffolk Council and Suffolk County Council.</p>		<p>ESC notes that paragraph 132 (REP13-020) confirms that trees and shrubs will not be planted within 5m of the footprint of the drainage basins, which ensures consistency with the updated Outline Landscape and Ecological Management Strategy (REP13-007). ESC has no further comments to make on the changes made to the document at Deadline 13.</p>

Appendix 2 – Letter from NG-ESO

National Grid ESO
Faraday House, Gallows Hill
Warwick, CV34 6DA

nationalgridESO

Sent via e-mail to:

www.nationalgrideso.com

Wednesday 27th October 2021

Electricity System Operator (ESO) Open Letter on the Offshore Transmission Network Review (OTNR)

Dear Colleagues,

Thank you for your letter dated 6th October 2021. I am pleased to hear your positive feedback on the work undertaken to date and I can confirm that we are happy to continue to engage in future. I am writing to acknowledge receipt of your letter and provide a list of projects in the East of England considered to potentially be in scope of the Early Opportunities workstream. This can be found in Figure 1 below, but it is worth noting important caveats in relation to the information.

- This is solely an ESO view based on our interpretation of the criteria which have previously been set out by BEIS and Ofgem¹ and as such the list may not be definitive.
- This is solely information collated from publicly available sources and as such the list may not be comprehensive.
- A project being included as potentially in scope of the Early Opportunities workstream doesn't indicate that the developer has opted in to explore co-ordination, or that we are in dialogue with the developer in relation to potential co-ordination, nor that there is necessarily any viable potential for co-ordination.
- Based on the above caveats this list therefore remains subject to change.

Figure 1

	Offshore Wind	Interconnectors
Status Quo	<ul style="list-style-type: none"> • Dogger Bank 1,2 & 4 • East Anglia 3 • Hornsea 2 & 3 • Sofia 	<ul style="list-style-type: none"> • Viking Link
Early Opportunities	<ul style="list-style-type: none"> • Boreas • East Anglia 1 North & 2 • Dudgeon extension • Sheringham Shoal extension • Five Estuaries • North Falls • Race Bank Extension • Vanguard East & West • Hornsea 4 	<ul style="list-style-type: none"> • Aminth • Eurolink • Nautilus • Continental Link • SENECA • The Superconnection • Cronos • Kulizumboo • Southernlink • Tarchon

As a final point of clarification, whilst demand and multi-purpose interconnectors are within the scope of the wider OTNR, they may not necessarily be included within the Holistic Network Design being developed within Pathway to 2030.

If you have any further questions in relation to the above or the ESO work within the OTNR more generally please let me know, including if a discussion would be beneficial in future.

Yours sincerely,

Graham Stein
Offshore Coordination Senior Manager

¹ <https://www.ofgem.gov.uk/publications/consultation-changes-intended-bring-about-greater-coordination-development-offshore-energy-networks>