



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicant's Comments on Relevant Representations Volume 4: Landowners

Applicant: East Anglia ONE North Limited
Document Reference: ExA.RR4.D0.V1
SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-000971

Date: 11th June 2020
Revision: Version 1
Author: ScottishPower Renewables

Applicable to East Anglia ONE North and East Anglia TWO



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	08/06/2020	Paolo Pizzolla	Julia Bolton/Ian Mackay	Rich Morris

Rev	Date	Prepared by	Checked by	Approved by
01	08/06/2020	Paolo Pizzolla	Julia Bolton/Ian Mackay	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
01	n/a	n/a	n/a

Rev	Page	Section	Description
01	n/a	n/a	n/a



Table of Contents

1	Introduction	1
2	Comments on Landowners Relevant Representations	2
2.1	Angela Daniell (RR-256)	7
2.2	Annabel Newberry (RR-602)	12
2.3	Barbara Jeffries (RR-455)	33
2.4	DA Phillips Ltd (RR-031)	36
2.5	Elizabeth Everett (RR-311)	45
2.6	Fielden Ltd (RR-041)	47
2.7	Graeme John Bloomfield (RR-152)	63
2.8	Jonathan Franklin (RR-334)	79
2.9	June Bloomfield (RR-153)	83
2.10	Maria Toone (RR-822)	89
2.11	Martin Cotter (RR-237)	101
2.12	Martin Handscombe (RR-394)	104
2.13	Michael Mahony (RR-538)	109
2.14	Mike Lewis (RR-512)	124
2.15	Mr JH Rogers (RR-069)	128
2.16	Mrs Ann Dallas (RR-255)	143
2.17	Mrs C A Morling (RR-590)	156
2.18	Natasha Mann (RR-548)	164
2.19	Peter Mann (RR-549)	174
2.20	Richard Mann (RR-550)	183
2.21	Simon Newberry (RR-603)	193
2.22	Simon Ward on Behalf of Petula Ward (RR-867)	214
2.23	St. Edmundsbury and Ipswich Diocesan Board of Finance (RR-079)	216
2.24	The Ogilvie Family Trust (RR-063)	218
2.25	The Sizewell Estate Partnership (RR-073)	229
2.26	Theresa Tollemache (RR-820)	240
2.27	William Gault (RR-347)	246
2.28	William Reeve (RR-672)	250



This document is supported by the following appendices:

Appendix number	Title
1	Marine Policy Clarification Note
2	Wave Climatology Clarification Note
3	Fish and Shellfish Ecology Clarification Note
4	Offshore Ornithology Precaution Note
5	Outer Thames Estuary Cabling Note
6	Figure 1 Disposal Site Locations (Windfarm Site)
7	Offshore Windfarm Visibility and Visual Impact Threshold Distances (2012) Journal Article
8	JNCC (2020) Guidance for Assessing the Significance of Noise Disturbance Against Conservation Objectives of Harbour Porpoise SACs



Glossary of Acronyms

ABP	Associated British Ports
ACoW	Arboricultural Clerk of Works
AEol	Adverse Effect on Integrity
AIL	Abnormal Indivisible Loads
AIS	Air Insultaed Swithgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
APP	Application Document
AQMA	Air Quality Management Area
AQMP	Air Quality Management Plan
AR	Avoidance Rate
BBPP	Breeding Bird Protection Plan
BCT	Bat Conservation Trust
BDMPS	Biologically Defined Minimum Population Sizes
BEIS	Department for Business, Energy & Industrial Strategy
CCS	Construction Consolidation Sites
CfD	Contract for Difference
CFWG	Commercial Fisheries Working Group
CIA	Cumulative Impact Assessment
CION	Connection and Infrastructure Options Note
CLO	Community Liaison Officer
CoCP	Code of Construction Practice
COLREGS	International Convention for the Prevention of Collision at Sea
CMS	Construction Method Statement
CRM	Collision Risk Model
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
DEFRA	Department for Food Agriculture and Rural Development
DEPONS	Disturbance Effects of Noise on the Harbour Porpoise Population in the North Sea
DML	Deemed Marine Licence
DMO	Destination Mangement Organisation
EC	European Commission
EclA	Ecological Impact Assessment
ECoW	Ecological Clerk of Works
EDR	Effective Deterrent Range
EIA	Environmental Impact Assessment
EMF	Electromagnetic Fields
EMP	Ecological Management Plan
EPP	Evidence Plan Process
EPS	European Protected Species
ERCOP	Emergency Response Cooperation Pla
ES	Environmental Statement
ESC	East Suffolk Council
ETG	Expert Topic Group
ExA	Examining Authority
FFC	Flamborough & Filey Coast
FLCP	Fisheries Liaison and Co-existence Plan
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
FRA	Flood Roisk Assessment
FTE	Full Time Equivalent



GEART	Guidelines for the Environmental Assessment of Road Traffic
GIS	Gas Insulated Switchgear
GPS	Global Positioning Satellite
HDD	Horizontal Directional Drill
HE	Historic England
HGV	Heavy Goods Vehicle
HLC	Historic Landscape Characterisation
HRA	Habitats Regulation Assessment
IALA	International Association of Lighthouse Authorities
IAQM	Institute of Air Quality Management
ICNRR	International Commission on Non-ionizing Radiation Protection
IEMA	Institute of Environmental Management and Assessment
IHLS	International Herring Larvae Survey
ILE	Institute of Lighting Engineers
IOF	Important Ornithological Features
IP	Interested Party
LCT	Landscape Character Type
LCV	Light Commercial Vehicle
LGV	Light Goods Vehicles
LLFA	Lead Local Flood Authority
LMP	Landscape Management Plan
LVIA	Landscape and Visual Impact Assessment
MCA	Maritime and Coastguard Agency
MCLG	Ministry of Housing, Communities & Local Government
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MOD	Ministry of Defence
MoU	Memorandum of Understanding
MPA	Marine Protected Area
MSFD	Marine Strategy Framework Directive
MSS	Marine Scotland Science
NALEP	New Anglia Local Enterprise Partnership
NATS	National Air Traffic Service
NE	Natural England
NFFO	National Federation of Fishermen's Organisation
NGET	National Grid Electricity Transmission
NNR	National Nature Reserve
NO ₂	Nitrous Oxide
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRA	Navigational Risk Assessment
NSIP	Nationally Significant Infrastructure Project
NtM	Notices to Mariners
OFTO	Offshore Transmission Owner
OLEMS	Outline Landscape and Ecological Management Strategy
OLMP	Outline Landscape Management Plan
ONR	Office for Nuclear Regulation
OREI	Offshore Renewable Energy Installation
ORJIP	Offshore Renewables Joint Industry Programme
OTP	Outline Travel Plan
OWSI	Outline Written Scheme of Investigation
OWSMF	Offshore Wind Strategic Monitoring Forum
PEIR	Preliminary Environmental Information Report
PHE	Public Health England



PIDs	Public Information Days
PPG	Planning Practice Guidance
PRoW	Public Rights of Way
PRoWS	Public Rights of Way Strategy
PSA	Particle Size Analysis
RAG	Red Amber Green
REPIR	Radiation (Emergency Preparedness and Public Information) Regulations
RoC	Review of Consents
RPG	Registered Parks and Gardens
RSPB	Royal Society for the Protection of Birds
RYA	Royal Yachting Association
SAC	Special Area of Conservation
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeology Service
SEA	Strategic Environmental Assessment
SEL	Sound Exposure Level
SIP	Site Integrity Plan
SLVIA	Seascape, Landscape and Visual Amenity
SNH	Scottish Natural Heritage
SNS	Southern North Sea
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SOLAS	International Convention for the Safety of Life at Sea
SoS	Secretary of State
SPA	Special Protected Area
SPL	Sound Pressure Level
SPR	ScottishPower Renewables
SSC	Suspended Sediment Concentrations
SSSI	Site of Special Scientific Interest
STEM	Science, Technology, Engineering, and Mathematics
SuDS	Sustainable Drainage System
SZC	Sizewell C
TP	Travel Plan
TWT	The Wildlife Trust
UXO	Unexploded Ordnance
WDC	Whale and Dolphin Conservation
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator
ZTV	Zone of Theoretical Visibility



Glossary of Terminology

Applicant	East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
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.
East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.



Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Monitoring buoys	Buoys to monitor <i>in situ</i> condition within the windfarm, for example wave and metocean conditions.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
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 ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed 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 ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.

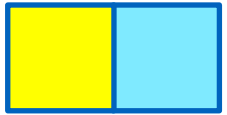


Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
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 cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
Onshore substation	The 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 ONE North project.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.



1 Introduction

1. The Applicant's comments on Relevant Representations received from Interested Parties (IPs) for East Anglia ONE North ('the Project') have been separated into separate Volumes, as discussed in **Volume 1** (document reference ExA.RR1.D0.V1).
2. This Volume presents the Applicant's comments on Relevant Representations received from IPs which have been identified as persons with an interest in land, of which 36 Relevant Representations were received.
3. It should be noted that one IP identified as persons with an interest in land only submitted a Relevant Representations for one Project, however, this Representation has been considered with regard to both Projects.
4. Order Land is described in the **Book of Reference** (APP-028), in accordance with Regulation 7(1) of the APFP Regulations. Order Land is held by a number of individuals, corporations and companies and where a Relevant Representation was received by the Planning Inspectorate from these IPs, the Applicant's comments regarding these Relevant Representations are provided in the tables below. In addition, information regarding the relevant plots, nature of the IP's interest and rights sought over land are also provided.
5. In accordance with the ExA's procedural decisions on document management of 23rd December 2019, this document is applicable to both the East Anglia ONE North and East Anglia TWO Applications (with the exception of the Glossary of terminology and Introduction and the specific sections listed in **paragraph 4** below). It is therefore largely endorsed with the yellow and blue icon used to identify materially identical documentation. Where a section differs between the East Anglia ONE North and East Anglia TWO ('the Projects'), the coloured box in the headers and the colour of the section headings will reflect this as well as text in the footers.
6. In addition, Relevant Representations submitted by the following IPs differed between the Projects and therefore the coloured box in the headers and the colour of the section headings reflects this:
 - Barbara Jeffries (**Volume 4, section 2.3**);
 - Elizabeth Everett (**Volume 4, section 2.5**);
 - Jonathan Franklin (**Volume 4, section 2.8**);
 - Theresa Tollemache (**Volume 4, section 2.26**); and
 - William Gault (**Volume 4, section 2.27**).



2 Comments on Landowners Relevant Representations

7. The Applicant's comments on Relevant Representations received from landowners can be found in **Table 2** to **Table 57** below.
8. It should be noted that some IPs with an interest in land have also been identified as local authorities, statutory consultees or non-statutory organisations, and therefore the Applicant's comments on their Relevant Representations are provided in **Volume 3**. Information regarding the relevant plots, nature of the IP's interest and rights sought over land for these IPs are detailed in **Table 1** below.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

Table 1 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Number	Representation	Applicant's Comments	Plot Number	Rights Sought	Nature of Land Interest
Anglian Water Services Ltd RR-024		See Volume 3 Table 18	62	Temporary Occupation and Use	in respect of foul water drainage pipe
			100, 104	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of foul water drainage pipe
			57	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of foul water drainage pipe, foul drainage pipe and rising water main
East Suffolk Council RR-002		See Volume 3 Table 1	3	Temporary Occupation and Use and Acquisition of Permanent Rights	Lessee
EDF Energy Nuclear Generation Limited RR-038		See Volume 3 Table 24	29, 31, 35	Temporary Occupation and Use	as beneficiary of option agreement dated 22 October 2014
			28, 30, 39	Temporary Occupation and Use and Acquisition of Permanent Rights	as beneficiary of option agreement dated 22 October 2014
EDF NNB Generation Company (SZC) Limited RR-037		See Volume 3 Table 25	19, 33	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
National Grid RR-056		See Volume 3 Table 33	113, 114	Freehold Purchase	in respect of overhead electricity cables
			113	Freehold Purchase	in respect of rights to construct and maintain



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

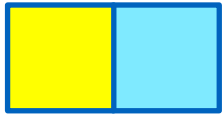
Relevant Number	Representation	Applicant's Comments	Plot Number	Rights Sought	Nature of Land Interest
					electricity lines and restrictive covenants
			29, 31, 35	Temporary Occupation and Use	in respect of easement
			17, 18, 19, 20, 21, 116, 117, 119, 120, 121, 134, 144, 145, 146	Temporary Occupation and Use	in respect of overhead electricity cables
			145, 146	Temporary Occupation and Use	in respect of right of way
			17, 18, 19, 26, 33, 116, 119, 134, 136	Temporary Occupation and Use	in respect of rights to construct and maintain electricity lines and restrictive covenants
			30	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of easement
			16, 25, 27, 39, 40, 115	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of overhead electricity cables
			16, 22, 23, 24, 25, 39, 40, 41, 115	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of rights to construct and maintain electricity lines and restrictive covenants
Network Rail Infrastructure Limited		See Volume 3 Table 48	26, 29	Temporary Occupation and Use	in respect of restrictive covenants



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

Relevant Number	Representation	Applicant's Comments	Plot Number	Rights Sought	Nature of Land Interest
RR-060			25, 27, 28, 30	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of restrictive covenants
RSPB RR-067		See Volume 3 Table 61	2, 5, 6, 22, 23, 24	Temporary Occupation and Use and Acquisition of Permanent Rights	as beneficiary of management agreement
Suffolk County Council RR-007		See Volume 3 Table 4	68, 98, 99, 105, 107, 108, 109, 113, 114, 128, 129, 130, 133, 135	Freehold Purchase	in respect of public right of way
			26, 29, 31, 34, 35, 36, 37, 38, 62, 79, 84, 89, 90, 91, 119, 138, 142, 144, 145, 146, 147, 157	Temporary Occupation and Use	in respect of public right of way
			19, 32, 33, 52, 117, 136, 137, 148, 149, 150, 151, 154, 156, 157, 158, 159, 163, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 117A	Temporary Occupation and Use	Occupier (as highway authority)
			17, 18, 20, 21, 143	Temporary Occupation and Use	Owner
			2, 4, 7, 14, 15, 24, 25, 27, 30, 40, 41, 49, 61, 63, 64, 67, 82, 83, 85, 86, 104	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of public right of way
			46, 57, 72, 77, 97, 100	Temporary Occupation and Use and Acquisition of Permanent Rights	Occupier (as highway authority)



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

Relevant Number	Representation	Applicant's Comments	Plot Number	Rights Sought	Nature of Land Interest
			3	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner



2.1 Angela Daniell (RR-256)

Table 2 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Angela Daniell RR-256	37, 38	Temporary Occupation and Use	in respect of right of way

Table 3 Applicant's Comments on Angela Daniell's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	My general concerns are the impact on the unspoilt countryside and coast, an AONB area - particularly Sandlings Heath.	<p>The landscape impact of the cable route construction, specifically its effect on the Estate Sandlands Landscape Character Type and AONB special qualities, is described in section 29.6.1.2 and Appendix 29.3 (APP-567) (Section 29.3.2) of Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>Significant, in Environmental Impact Assessment (EIA) terms, short-term, temporary construction stage effects on the landscape/scenic quality and wildness/tranquillity special qualities of Area A (between Thorpeness, Sizewell and Leiston) of the AONB (Figure 29.3 (APP-393)) will primarily be experienced over several separate short 2-3 month periods of peak construction activity and not continuously throughout the construction phase. Over the majority of the construction stage, the relevant section of the onshore cable route will not be subject to these key construction works and the onshore cable route will primarily consist of installed infrastructure and stripped topsoil to be reinstated, during which time the effects on these AONB special qualities are considered not significant in EIA terms due to the limited construction activity. In addition, if the open cut trench methodology is selected as the appropriate method to cross the Sandlings Special Protection Area (SPA) then works will be undertaken outside the breeding bird season. Works will avoid the peak usage periods of the AONB. Given its route primarily through farmland and avoiding features of natural heritage value, the construction of the onshore cable route is assessed as having not significant in EIA terms effects on the natural heritage features of the AONB.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>After exiting the AONB, the onshore cable route then takes a route which runs parallel to the western edge of the AONB between Leiston and Aldringham. In this area, outside the AONB, there will be no direct effects from construction of the onshore cable route on the landscape elements/physical features of the AONB (Area B – between Thorpeness, Aldeburgh and Snape). There will be no significant in EIA terms effects on the landscape and scenic quality of the setting, relative wildness, tranquillity, natural and cultural heritage features of the AONB as a result of visibility of the construction of the onshore cable route when it is in close proximity to the AONB boundary.</p> <p>To the south of Aldringham, the onshore cable route extends west away from the coastal areas of the AONB towards the onshore substation, becoming increasingly distant from the coastal part of the AONB, while running parallel to, and approximately 1km north of the area of AONB covering the River Alde estuary. The construction of the onshore cable route over this section will have no significant effects on the special qualities of the AONB.</p> <p>The effect of the onshore cable route during construction is therefore only assessed as having significant in EIA terms, short-term and temporary effects on the character of the AONB within a localised area of the onshore cable route between Thorpeness, Sizewell and Leiston (Area A) but is assessed as not significant in EIA terms, short-term and temporary on the wider AONB within the LVIA study area (Areas B and C (between Sizewell and Dunwich Forest)).</p> <p>The Applicant also has undertaken an impact appraisal for the onshore substations on the Suffolk Coast and Heaths AONB as part of the site selection process (section 4.9.1.3.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052).</p> <p>The appraisal concluded that if the substations were to be sited in or immediately adjacent to the AONB then there were likely to be significant effects on the special qualities of the AONB, and if sited within the western substation zones, there were likely to be no significant effects on the special qualities of the AONB.</p> <p>The proposed onshore substation and National Grid infrastructure are therefore sited outside of the the Suffolk Coast and Heaths AONB to avoid significant effect on the special qualities of the AONB.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The Applicant notes the comments made and these matters have also been raised by a number of individual Relevant Representations. The Applicant has therefore prepared topic responses on the matters:</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p> <p>Please see Table 12 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape - cable route.</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p> <p>Please see Table 19 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p>
002	The threat to wildlife and the destruction of ancient woodland.	<p>The Applicant has looked to address this comment in their responses:</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p> <p>Please see Table 33 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding woodland.</p>
003	Light and noise pollution.	<p>The Applicant has looked to address this comment in their responses:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p>
004	Increased traffic on small roads.	<p>The Applicant has looked to address this comment in their responses:</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
005	Life in the quiet village of Friston will be altered by the presence of a substation complex. This is a tranquil area which attracts visitors and I fear the impact on the tourist industry.	<p>The Applicant has looked to address this in their responses:</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p>
006	On a specific note I am concerned about the cable trench running too close to my home and workshop and	<p>The onshore cable corridor routing has avoided residential titles and gardens (where possible) and minimised disruption to landowners, services, road users and residents generally (see Chapter 4 Site Selection and Assessment of Alternatives (APP-052). A comprehensive assessment of the impacts on residential properties has been undertaken, considering matters such as air quality, noise and traffic and transport (see Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 26 Traffic and Transport (APP-074)).</p> <p>As required by the draft DCO (APP-023) a Code of Construction Practice (CoCP) must be produced by the Applicant and submitted to the relevant planning authority for approval prior to the commencement of construction. The CoCP will provide a key mechanism, enforceable via the Development Consent Order (DCO), through which the relevant regulatory authorities can</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>be assured that environmental impacts associated with the construction of the onshore infrastructure will be formally controlled and mitigated. An Outline Code of Construction Practice (oCoCP) is provided with the Application (APP-578).</p> <p>The Applicant has looked to address this comment in their response:</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p>
007	the closure of the PRoW leading to my home.	<p>A Temporary Stopping up of Public Rights of Way Plan (APP-013) has been submitted with the Application, as has an Outline Public Rights of Way Strategy (APP-581) which identifies the Public Rights of Ways (ProW) to be temporarily stopped up and the temporary diversions associated with the temporary stopping up. The Applicant is not seeking rights to temporarily stop-up PRoW E-363/027/0 between King Georges Avenue/Lovers Lane and this property.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.2 Annabel Newberry (RR-602)

Table 4 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Mrs Annabel Newberry RR-602	136	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	134	Temporary Occupation and Use	Owner

Table 5 Applicant's Comments on Annabel Newberry's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	My name is Annabel Newberry and I am the freeholder, along with my husband, (Redacted) I am a ceramist, with a workshop at our property. Our property is set in 5 acres, next to the proposed site of the new substations for East Anglia One and East Anglia Two and potential extensions in the future. Our property includes a Caravan and Camping Club Certified site which is listed as a quiet getaway and a market garden. We have spent the last few years improving the site since we bought the property, including the creation of an entertainment barn, a shop and other amenities for the improvement of the camping income. We raise livestock, including chickens and pigs, and supply the local residents with fresh eggs and pork products, as well as seasonal fruit and vegetables from our market garden. We moved into the area to live in a quiet rural setting, expanding our tourism business to provide income for our future retirement.	Noted.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
002	<p>Lack of clarity of proposals/failure to consult:</p> <p>From the start of this process, Scottish power has been very unclear as to exactly what their proposals are likely to be. Initial consultations suggested that the Friston site was only one of 7 sites which was under consideration and so on detailed enquiry Scottish Power reassured us that this site was not top of their list and so there was little engagement on the details as to how it would affect us. After the site was definitively chosen the Scottish Power representative visited the site and informed us that the company did not need to purchase our site as they would not be using it for any of the scheme, and that we would only be compensated for noise, dust and disruption. However, no concrete proposals were advanced.</p>	<p>Comments relating to the clarity around the Applicant's proposals and subsequent failure to consult are addressed in relation to specific points below. However, in response to the specific point made by the respondent in relation to the location of the onshore substation, the onshore substation site selection process has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter. Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p> <p>In relation to the specific proposals for the land to which the respondent is referring, the Applicant can confirm that subject to detailed design and further investigatory works by National Grid the following works are proposed.</p> <p>The existing 400kV angle tower (Ref.4ZX19) located to the west of the Respondent's property is proposed to be retained as part of the OHL works, with the diverted OHL spans to the west re-connecting to this existing tower. The feasibility design has been developed to ensure the proposed new angle of deviation is within the original tower design to limit the extent of works required at this tower (e.g. avoid replacement). Subject to the final route alignment, tower strengthening and modifications to maintain electrical safety clearances may be necessary.</p> <p>Land in Plot 134 between 4ZX019 and 4ZX018 may be required for setting up machine/pulling sites in order to string conductors.</p>
003	<p>Insufficient consultation on concrete plans/failure to consult:</p> <p>It was not until 22nd October 2019, almost two years after the initial public consultations and moments before the application was submitted, that Scottish Power indicated to us that areas of our property were to be included in the DCO boundary on a temporary basis. At no stage prior to</p>	<p>The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p>



No.	Relevant Representation	Applicant's Comments
	<p>this had they indicated this was likely, in fact the opposite was the case. The plan attached to that letter includes the whole of our property, apart from the house, including access, our private gardens, the entire camping facilities, land for animals, fruit and agriculture and our outbuildings. This would render our business unviable and it is entirely unclear how we would be expected to live in the property whilst these works are being carried out. We have still been given no indication of time periods, dates for entry and exit and what the land would be used for. In this letter the applicant is still stating that they don't know and won't know how disruptive this will be until detailed design is carried out at a date in the future which has not been specified. This is wholly unacceptable, as it has a material impact on our ability to run our businesses from the site, or to develop our business further.</p>	<p>Further correspondence specifically referred to by the respondent comprised a letter dated 22nd October 2019 setting out the reason for the inclusion of the respondent's property in the Order Land.</p> <p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains that the Project is based on a project design envelope (or 'Rochdale Envelope') approach. This involves definition of a range of parameters that enables the assessment of each impact to be conducted based on design parameters likely to result in the maximum adverse effect (i.e. the worst case scenario). It is recognised by the Planning Inspectorate Advice Note Nine that, at the time of submitting an application, offshore wind developers may not know the precise nature and arrangement of infrastructure and associated infrastructure that make up the proposed development. The Rochdale Envelope approach provides flexibility that is important to the Project as it prevents consent being granted for specific infrastructure or a particular layout which is not optimal or efficient at the time of construction.</p> <p>The Applicant notes the comment made with regards to consultation, tourism, and hospitality and these topics have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p>
004	<p>Furthermore, should the proposals go ahead, it is extremely unlikely that we could continue to run our business and deprive income from the same given the proximity of a large industrial complex which will be fully visible and have sufficient noise and light pollution to mean it is incompatible both with family life and a tourism business. This has been a process which has been extremely stressful for both of us, particularly because of</p>	<p>The Applicant notes the comment made with regards to consultation, tourism, and hospitality and these topics have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	the lack of information, lack of process or engagement from the company and most recently the implication that this is not something for which the company itself feel responsible but has sub contracted to NGET. We have no interaction with NGET.	
005	<p>Lack of engagement even after request for further information:</p> <p>Even now they are not being clear to us what exactly or how exactly we will be affected by the construction or operation of the site as Scottish Power, as applicant has wholly failed to consult us adequately or properly in respect of their plans for their proposed site. We have tried to engage with the company and its agents on numerous occasions and they have been extremely obtuse as to what their plans are and how they will affect us, despite our contacting them and asking for more information.</p>	<p>The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p> <p>Further correspondence specifically referred to by the respondent comprised a letter dated 22nd October 2019 setting out the reason for the inclusion of the respondent's property in the Order Land.</p>
006	<p>Failure to discharge duty to consult:</p> <p>The applicant has a duty pursuant to s42 of the Planning Act 2008 to consult</p> <p>(a) such persons as are prescribed and</p> <p>(d) each person who is within one or more of the categories in s44.</p> <p>In particular, under s44 it is required to consult any person who if the Order were to be implemented would become entitled to make relevant claims. Given the proximity of our land to the proposed site and the inclusion of our land within the boundary of SPR's proposed Development</p>	<p>The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p> <p>Further correspondence specifically referred to by the respondent comprised a letter dated 22nd October 2019 setting out the reason for the inclusion of the respondent's property in the Order Land.</p>

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
	Consent Order application we understand that we would be entitled to make claims under both section 10 of the Compulsory Purchase Act 1965 and claims under Part 1 of the Land Compensation Act 1973. We are also entitled to be consulted pursuant to s47 of the Planning Act 2008 by reason of being a person living within the vicinity of the development land.	
007	<p>Failure to discharge higher duty in respect of those with land within the DCO boundary:</p> <p>The intention of the 2008 Planning Act was to ensure that the applicant is required to carry out adequate consultation. It is a principle of law set out in <i>R(Moseley) v London Borough of Haringey</i> that the degree of specificity with which, in fairness, an authority should conduct its consultation exercise may be influenced by the identity of those whom it is consulting. The case clearly sets out that the demands of fairness are somewhat higher when an authority contemplates depriving someone of an existing benefit or advantage. Failure to consult/obfuscation: Very disappointingly, Scottish Power seem to have reached the erroneous conclusion that they do not need to properly consult us on their plans. At every turn they have sought to obfuscate what they are intending to do and the consequences on us. They have not indicated to us that they wish to use our land but have sought to use some existing powers which National Grid have to enter on to our land to maintain their existing overhead lines. As a result, Scottish Power have not fully consulted us at all. Reading the lease, it is very clear to us that this lease is wholly inadequate for the purposes of carrying out a substantial new development and we find it extraordinary</p>	<p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains that the Project is based on a project design envelope (or 'Rochdale Envelope') approach. This involves definition of a range of parameters that enables the assessment of each impact to be conducted based on design parameters likely to result in the maximum adverse effect (i.e. the worst case scenario). It is recognised by the Planning Inspectorate Advice Note Nine that, at the time of submitting an application, offshore wind developers may not know the precise nature and arrangement of infrastructure and associated infrastructure that make up the proposed development. The Rochdale Envelope approach provides flexibility that is important to the Project as it prevents consent being granted for specific infrastructure or a particular layout which is not optimal or efficient at the time of construction.</p> <p>National Grid's rights for existing assets on this land are within a Deed of Grant dated 10th February 1966 (T. Bowman esq. – CEGB). This gives Full Rights and Liberty for entry onto the property at all reasonable times with or without vehicles, plant and equipment to retain, use, maintain, repair, renew, inspect and remove either of the electric lines. The Deed also permits the grantee, at its expense and in a proper and woodman like manner to fell or lop all trees and coppice wood on the property that, if not felled or lopped, would obstruct or interfere the working of the electric lines.</p> <p>The Applicant is seeking rights to permit temporary possession and use of the land for purposes which are no more extensive than those which exist pursuant to the Deed of Grant.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	that Scottish Power and National Grid should seek to deprive us of the quiet enjoyment of our land without paying us any compensation whatsoever or consulting us as to their plans. We have had no interaction with NGET at all. No one has visited us or contacted us so to the extent that any work to be done as part of this project involves NGET using our land there has been a total and complete failure to engage or consult.	
008	<p>Planning Inspectorate should reject the plans and require further consultation:</p> <p>This failure to engage properly with us, despite us as private individuals having sought information from them as to their plans, means that the Planning Inspectorate needs to consider very carefully whether there has in fact been a proper consultation or whether this application should be rejected, and Scottish Power required to conduct another round of adequate consultation. This is particularly the case given that the first indication that our land was included was in the letter dated 22 October moments before they submitted the application.</p>	The Applicant notes this comment and would refer to responses set out above confirming the extent of consultation with the respondent.
009	<p>Breach of human rights if no compensation:</p> <p>No authority has the power to deprive someone of the quiet enjoyment of their land without paying compensation. That is a basic human right which is enshrined in the both in international and in domestic law. Article 1 of the First Protocol of the Human Rights Act imposes an obligation of the state not to interfere with the peaceful enjoyment of property or deprive a person of their possession. We understand that that interference</p>	<p>Temporary possession powers have always been a feature of Development Consent Orders (DCO) (and indeed, temporary possession powers can be found within the 2009 Model Provisions). One of the key reasons for including such powers is to avoid the need to acquire a greater interest in land than is necessary and therefore limit the interference with the rights of landowners.</p> <p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	with this right can be subject to conditions provided for by law, but it must achieve a fair balance between the general public interest and the protection of an individuals property. It is a fundamental principle of those protections for the individual that any interference must strike a fair balance between the demands of the general interests of the community and the requirement of an individuals fundamental rights. A lack of any compensation would be considered wholly disproportionate. Scottish Power's plans will deprive us from not only our land and our home but the whole of Annabel Newberry's income which is made wholly of the campsite, market garden and ceramist studio, plus a proportion of Simon Newberry's income from his business and the barns where he stores his tools and conducts his business. One part of Newberry Engineering is making demonstration units for leading electrical underfloor heating manufacturer requiring large amounts of the space within the outbuildings. Without this workspace a considerable income source would be lost, or different premises would be required.	
010	<p>Planning Inspectorate need to consider compulsory purchase powers:</p> <p>We understand that this representation is not meant to cover the issues of precise compensation but we have included our very legitimate concern that Scottish Power may seek to appropriate our land without paying any compensation whatsoever which would infringe our human rights and be unlawful under the statutes under international and domestic law, which allow for that</p>	<p>The land will be used only temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access. Any compensation payable shall be subject to the relevent legislation.</p> <p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	fundamental balance between general public interest and protection of the individual's property	
011	<p>DCO powers are too wide and extensive and insufficiently clear:</p> <p>The planning authority should consider the powers which are being requested in the draft Development Consent Order which would appear to be very extensive. The power in s18(1) of the draft DCO provides that the undertaker may compulsorily acquire so much of the Order land as is required for the authorised Project or to facility or is incidental to it. Our property is included in the Order land but Scottish Power (it is included as a red blob on Drawing Number EA2-DEV-DRG-IBR-000796 dated 16/09/19) and therefore is land which can be compulsorily acquired by the developer. Yet they have stated that they do not intend to compulsorily acquire our property. If this is the case, then either they accept that compensation must be payable for such rights to lawful or they need to remove our property from the DCO land in its entirety. Under the draft DCO the applicant should expressly set out which parcels of land are to be acquired. The powers sought are insufficiently precise and should be struck out or turned down by the planning authorities for vagueness.</p>	<p>The Statement of Reasons (APP-026) states that Plot 134 (the land to which this representation relates to) will only be used temporarily for carrying out the authorised project and specifically for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access. While existing rights exist over this plot in the form of a Deed of Grant of Easement in favour of National Grid, the Applicant is seeking powers of temporary possession which are of a similar nature to the rights contained within the Deed of Grant but purely on a temporary basis.</p> <p>Temporary possession powers have always been a feature of DCOs (and indeed, temporary possession powers can be found within the 2009 Model Provisions). One of the key reasons for including such powers is to avoid the need to acquire a greater interest in land than is necessary and therefore limit the interference with the rights of landowners.</p> <p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) and of the draft DCO (APP-023).</p>
012	<p>Temporary powers are incompatible with current land usage of sites:</p> <p>Under s26(1) of the draft DCO the applicant is requesting very broad powers to enter into and hold temporary possession of the land specified in column 2 of Schedule</p>	<p>The Applicant acknowledges that the statutory notice period for access to land to undertake works is not less than 14 days. However, the Applicant has extensive experience of working with landowners to mitigate the effects of the works on their land use and as such shall endeavour to actively engage with the respondent</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>9. They are requesting the power to remove, building, agricultural plant, drainage, fences and vegetation and he power to use the land as a working site and to conduct any work set out in part 1 of schedule 2. They are also asking for the power to enter into the site on not less than 14 days' notice and then can remain on the site for up to a year after completion of the works. This makes our businesses completely untenable from the date of the Order until a year after the completion of the works. We cannot rehome our chickens and pigs on 14 days' notice. Nor could we continue to run our camping business or our market garden if on 14 days' notice Scottish Power could arrive with diggers.</p>	<p>within reasonable timeframes with regards to the any proposed works on their land.</p>
013	<p>Lack of restrictions on temporary powers/restoration obligations:</p> <p>This is a very draconian power which is being sought and there are no restrictions on how these power could be applied. It should be the case the at Scottish power should need to specify when, what and for how long they are seeking to come onto the land. It would be the norm in development consent orders that the applicant is required to agree a detailed schedule of when it is to carry out what works when if they are temporary works. The powers derived would allow Scottish Power the right to level our home to the ground, including all the buildings on it, our sheds, outbuildings, toilet blocks, electrical hook-ups, fell all our trees, destroy our fences, fill in our pond and after they have finished walk away without having to replace anything, all with no compensation.</p>	<p>Temporary possession powers have always been a feature of DCOs (and indeed, temporary possession powers can be found within the 2009 Model Provisions). One of the key reasons for including such powers is to avoid the need to acquire a greater interest in land than is necessary and therefore limit the interference with the rights of landowners.</p> <p>The Application states that the land will be used only temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate access for these works. As noted by the respondent, the Applicant has removed the respondent's residential property and outbuilding from the Order limits and as such would have no powers to undertake any such demolition of residential property or building.</p> <p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
014	<p>Tree cutting powers are unduly extensive/ have economic consequences for those affected:</p> <p>Under s34 of the DCO there are wide powers for the felling and lopping of trees within or overlapping the Order limits. Much of the woodland on our land is grown and managed by us for the purposes of providing fuel and heating for our home, which is heated by way of woodburning stoves and a woodburning oven. Draconian powers to forcibly destroy trees and plant on our land to make way for temporary works deprives us of fuel and heating. It does not seem appropriate to us for these wide powers to be given with no protections are the amenity setting of our home, which has significant orchards growing many different orchards fruits which we sell as part of our market gardening business. There is no requirement to replace the trees which have been felled, no compensation for the loss of these income bearing assets. The powers derived would allow Scottish Power the right to level our home to the ground, including all the buildings on it Powers sought have potential for extended periods of blight: The power requested to allow for the works to commence up to 7 years after the Order has been made are too extensive. This is a very long period of time for people who are directly affected by the project. We have already been subject to over 2 years of blight and a further 7 years, plus any construction time, means that we are effectively prevented from continuing our livelihood for up to a decade. There is also a cumulative effect of both East Anglia One and Two and potential further extensions which could extend the blight yet</p>	<p>The Applicant notes that the plot is subject to a Deed of Grant of Easement dated 10th February 1966 in favour of National Grid in respect of overhead lines. This Deed of Grant provides NGET with rights to undertake felling and lopping of trees and as such, the powers being sought by the Applicant to carry out woodland management works are no greater than those to which the land is already subject.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	further. This seems wholly disproportionate and is a factor which should be taken into consideration.	
015	<p>Working hours on Site and impact on family life: Scottish Power has asked for very long periods of working on the site, which are wholly incompatible with family life and therefore have the power to breach our human rights. Construction periods are from 7 in the morning to 7 at night 5 days a week with Saturday working between 7-1pm. This would be intolerable from our perspective and these hours should be shortened significantly.</p> <p>Furthermore, the applicant is asking for additional powers to continue construction activities on an unrestricted basis 24 hours a day 7 days a week, including the shipment of abnormal loads, testing and commissioning, this would severely interrupt our sleep and give us no respite at all from the project. It should be noted that although the DCO applications for East Anglia One and East Anglia Two are separate applications, the planning authorities should when considering working hours consider the combined effect of both on the family lives of those living in close proximity to the proposed sites and the cumulative effect of the length of the overall impacts on the environment. It should also be noted that by their own admission Scottish Power accept that the impact of noise of construction on a predominantly rural location is much greater as there is no little background noise, and no background light pollution.</p>	<p>With specific reference to working hours on the respondent's land, it is possible that NGET may undertake works on a 24 hour basis given the strategic importance of the 400kV infrastructure upon which works are proposed. The ability to undertake 24 hour working on the respondent's land is sought only in relation to the following activities:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; • The completion of construction activities commenced during the approved working hours which cannot safely be stopped; • The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>The Applicant notes the comments made and these matters have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared topic responses on these matters:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.
016	<p>Noise:</p> <p>The noise portrayed in the application only relates to back ground "humming" during normal operation. The reality is several years of construction noise, would have a devastating effect on our businesses, livestock and general health and wellbeing. (Redacted). Dr Simon Newberry has already been dramatically affected by the stress and has recently been diagnosed with a heart condition and sleep problems brought on by stress of the proposals. Annabel Newberry has also been significantly affected by stress. The noise created both by the construction and operation of the plant proposed would have very negative and detrimental effects on both residents at Fairacre, as well as making their engineering, artistic, camping, market gardening and livestock businesses unworkable. The proposed monitoring of noise by Scottish power is "conveniently" nowhere near our property which will be adjacent to the substation and therefore is merely paying lip service to the requirement to understand the impact of noise on local residents. As one of the closest residents to the site, monitoring equipment should as a minimum be on our property. We are aware that the operation of such sites has the potential to seriously disrupt sleep and given the cumulative effect of a number of substations in this area, with potential additional extension sites in the future, we believe it is unlikely that the applicant will be able to keep the noise to a level which is consistent with ordinary family life. If</p>	<p>The Applicant has conducted a comprehensive construction noise and operational noise impact assessment as part of the Environmental Statement, Chapter 25 - Noise and Vibration (APP-073). In addition, a Construction Phase Noise and Vibration Management Plan will be produced as part of the final Code of Construction Practice (required by the draft DCO (APP-023)) and will require the approval of the relevant planning authority. This Plan will describe measures which shall be adopted to minimise noise impacts on receptors and will be based on the detailed design of the Project.</p> <p>Noise monitoring locations for the purpose of the impact assessment have been agreed with the local authorities, and the draft DCO (APP-023) identifies the two closest properties to the onshore substation and National Grid substation which will be the basis of ensuring compliance with the noise limit set out in the draft DCO (APP-023).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	construction goes ahead, it would be imperative to have background noise monitoring of construction and operation on our property. There is no representation or proposals by Scottish Power in limiting construction noise, in fact they have in their latest proposal increased construction time periods to 24 hours.	
017	<p>Substation switchgear:</p> <p>There is no mention of operational noise coming from the substation switchgear. Dr Newberry's experience as a Project Manager at the Galloper Substation at Sizewell Gap has provided personal knowledge that the Air Insulated switches outside will be heard at short distances. The noise insulated GIS hall proposed, which is very close to our property, will have Gas Insulated Switches operating 24 hours a day. These can be activated by maintenance, general operation and tripping creating a very loud "thunder clap" type of noise, which can still be heard at a considerable distance even though suppressed. This could be alarming to anyone living within such a close vicinity to the site.</p>	<p>The Applicant notes concerns regarding the use of air insulated switchgear (AIS) at the onshore substation, the Chapter 25 Noise and Vibration (APP-073) presents a comprehensive noise and vibration impact assessment of the onshore substation and National Grid substation. The onshore substation gas insulated switchgear (GIS) hall has been included in the noise model and the noise impact assessment. Appendix 25.5 Operational Phase Assessment (APP-526) details the approach taken to the proposed Project operational noise impact assessment modelling. The assessment undertaken demonstrates that, post mitigation, all operational impacts from the onshore substation have a maximum residual impact of negligible significance.</p> <p>Intermittency and impulsivity of the GIS is discussed in section 25.4.3.4 of Chapter 25 Noise and Vibration (APP-073). With regards to intermittency and impulsivity of the GIS, there would be no expected stops and starts to the fixed electrical plant. There are also no items of fixed electrical plant with impulsive characteristics under typical operating conditions. Where there may be air cooling fans that stop and start, this is not considered to be distinctly audible at the receptor nor above background ambient noise levels due to masking effects. Impacts on nearby residential receptors are assessed in section 25.6.2.1 using BS4142 criteria. Impacts are of negligible significance for all residential receptors when mitigated through an operational rating noise limit (in accordance with BS4142:2014+A1:2019) of 34dBA at the nearest sensitive receptors during the day time and night time, as secured through the draft DCO (APP-023).</p> <p>With regards to operational noise from the National Grid infrastructure (section 25.3.2.1 of Chapter 25 Noise and Vibration), it does not contain plant such as</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		high voltage transformers or shunt reactors, or rotating plant such as transformer coolers, that would usually be the dominant noise sources from a substation during operation. The worst-case assumes that this infrastructure will use AIS however these items of plant are designed to be inherently quiet in operation, and do not make operational noise at a level that would be perceptible at nearby residential receptors.
018	Impact on tourism: The reality is that this development will have a serious impact not only on our campsite but on tourism in general if the development consent order is granted. Our business will be wholly lost, and the many other businesses which depend on tourism in this area will also be hugely impacted despite Suffolk Coastal Council actively promoting Tourism. The noise, dust and loss of views will deter regular and new visitors to the site, the loss of the "quiet site" status would undoubtedly be removed from our campsite, even if after it has been temporarily taken away from us with no compensation, we finally get our land back. Not only would we lose a considerable annual income, local shops, restaurants and pubs, used by the campsite visitors would have a noticeable drop in business. Impact on wildlife: We would lose birds and wildlife which are a draw for the campsite. There would undoubtedly be disruption to migratory swallows and bats that roost at the property and all the wildlife that use our nature pond. The proposals would also completely disrupt / remove numerous country walks and footpaths / rights of way, another draw for our tourists.	<p>The Applicant notes the comment made regarding the impact of the Applicant's proposals on traffic and access and this has been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on this matter:</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
019	<p>Livestock:</p> <p>With the acquisition of our land, even if only for the period of construction, our livestock business will be lost. Our chickens are free range and roam the fields at leisure, which will no longer be possible, and we would lose the income from eggs. The annual pig livestock will no longer be possible due to the pens being acquisitioned for the "construction depot" and we would need to cease this business.</p>	<p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).</p>
020	<p>Construction:</p> <p>Initial consultation stated set working hours; this appears to have change to 24 hours, which would leave our property subject to dust almost continually. There is no proposal to limit noise and dust with respect to our property, which is one of the closest. The proposals show insufficient monitoring of construction.</p>	<p>Construction activities would normally be conducted during Monday to Friday working hours of 7am to 7pm and Saturday working hours of 7am to 1pm. Working hours are not proposed for Sundays or Bank Holidays. These working hours have been reduced on Saturdays from those originally proposed following feedback received from Section 42 consultation. Exceptions to these working hours for the works are described in section 6.9 of Chapter 6 Project Description (APP-054), for the landfall, onshore cable route and onshore substation include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the ES, such as concrete pouring, dewatering, cable pulling, cable jointing and trenchless technique; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>For the National Grid infrastructure, these exemptions include:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; Fitting out works associated with the National Grid substation; The completion of construction activities commenced during the approved working hours which cannot safely be stopped; The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>Working hours are secured through Requirement 23 and Requirement 24 of the draft DCO (APP-023) and will be signposted within the final Code of Construction Practice prepared post-consent to discharge Requirement 22 of the draft DCO (APP-023). The final Code of Construction Practice must accord with the Outline Code of Construction Practice submitted with the Application (APP-578), which provides detail on working hours within section 3.1.</p>
021	Here appears to be insufficient or no impact studies on traffic, drainage, cable corridor construction issues, local heritage and effect on tourism. Disruption to the environment, especially local wildlife and their habitat or the impact on the loss of valuable agricultural land.	<p>The Applicant notes the comments made and these matters have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared topic responses on these matters:</p> <ul style="list-style-type: none"> Traffic <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p> <ul style="list-style-type: none"> Drainage



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Please see Table 32 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding water resources and flood risk.</p> <ul style="list-style-type: none"> • Cable Corridor Construction Issues <p>Please see Table 25 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>Please see Table 21 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – construction strategy</p> <ul style="list-style-type: none"> • Local Heritage and Effect on Tourism <p>Please see Table 30 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p> <p>Please see Table 4 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cultural heritage.</p> <ul style="list-style-type: none"> • Local Wildlife and Habitat <p>Please see Table 18 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Please see Table 33 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding woodland.</p> <p>Please see Table 19 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p> <p>Loss of Agricultural Land</p> <p>Please see Table 11 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding land use.</p>
022	Traffic and Access: The increase in traffic due to construction and deliveries will increase noise, travel times and general exhaust pollution. Grove road and other minor roads will become "rat runs" for traffic trying to avoid the major construction routes. Grove road is one of the National cycle routes, it will become extremely dangerous for cyclists as the construction traffic and delivery vehicles increase. Access to our property will be hampered by the increase in traffic. New "access routes" to the substation and cable routes, although with the latest proposals were never in the original consultations, specifically ones leading off Grove Road.	<p>The Applicant notes the comment made regarding the impact of the Applicant's proposals on traffic and access and this has been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on this matter:</p> <p>Please see Table 31 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
023	Views: We moved to the property for the "quiet life" and beautiful country views. Due to "Technical Issues" we have been informed that it will not be possible to construction bunds and /or screening between ourselves and the substation.	<p>The Applicant notes the comment made regarding the impact of the Applicant's proposals on visual impact and this has been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on this matter:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	We have been given no explanation of why there can be no amelioration of what is a large industrial complex in a completely rural location. We will have and be within full view of this blight on the landscape.	Please see Table 13 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.
024	<p>Property devaluation and Compensation:</p> <p>Scottish power have informed us that there will be no compensation. This will be crippling to our personal finances, ability to support ourselves and our health and wellbeing. The property is now (due to the proposals) and in the foreseeable future unsaleable at a reasonable market rate. The years of personal and financial investment in the house, gardens, land and businesses will be lost without compensation. The planned further property improvements and business expansion, specifically with regards to the campsite and tourism are now in doubt, creating a stressful hiatus in our lives.</p>	<p>A number of Relevant Representations raise concerns with regards to reduction in the value of properties and house prices.</p> <p>The impact of the Project on house prices is not a material consideration. There are many reasons why house prices vary and, in any event, policy does not seek to prohibit activities which may have such effects. National Policy Statements do however offer specific policy support for the assessment of effects that a project may have on residential receptors. The Environmental Statement has provided appropriate impact assessment on residential receptors in line with the overarching National Policy Statements in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5). The potential impact on residential receptors has been considered throughout the development of the Project and this is reflected in the site selection process reported in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). In addition, the potential effects on residential receptors and residents has been further considered and evaluated in other topic specific chapters, including Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 74 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>The potential impact on non-residential land uses has been evaluated through Chapter 21 Land Use (APP-069) and Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). Appendix 21.1 (APP-499) details the relevant consultation undertaken. It is noted that, in terms of subsection 87(3) of the Planning Act 2008, representations that relate to compensation for compulsory acquisition of land or of an interest in or right over land are matters which the ExA may disregard.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
025	<p>Friston Parish Council representations:</p> <p>We have reviewed the Friston Parish Council representations, and the key issues put forward by Friston Parish Council and agree as a local resident with all of the issues which have been advanced. We fully support these issues and incorporate each and every one of those issues by reference into our submission as though we had written them all out in full here. We include every issue which has been raised by Friston Parish Council as our own objections to Scottish Power's proposals and draft DCO application. SASES representations: We have reviewed the representations put forward by the SASES, and the key issues put forward by SASES and agree with all of the issues which have been advanced. We fully support these issues and incorporate each and every one of those issues by reference into our submission as though we had written them all out in full here. We include every issue which has been raised by SASES as our own objections to Scottish Power's proposals and draft DCO application.</p>	<p>The points raised in the SASES Relevant Representation have been considered and are addressed in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1). The points raised in the Friston Parish Council Relevant Representation have also been considered and are addressed in Table 9 in Applicant's Comments on Relevant Representations Volume 3 (document reference ExA.RR3.D0.V1).</p>
026	<p>Failure to comply with both letter and spirit of the planning laws:</p> <p>Finally, Scottish power seemed to have forged ahead with their plans without consideration to the locals or ourselves. They have shown complete disregard of public consultations, provided misleading information prior to actual planning proposals and until recently completely concealed the planned acquisition of our land for the construction period. They seem to seek to hide behind NGET lease granted to maintain existing infrastructure to</p>	<p>Detail regarding specific consultation with the respondent has been confirmed previously and further detail on consultation with the wider local community is summarised in Table 1 of Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1).</p> <p>While existing rights exist over this plot in the form of a Deed of Grant of Easement in favour of National Grid Electricity Transmission, the Applicant is seeking powers of temporary possession which of a similar nature to the rights contained within the Deed of Grant but purely on a temporary basis as opposed to in perpetuity.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	seek to absolve them of the obligation to compensate us for the loss of amenity, loss of value, and impacts on our health, finances and wellbeing. Scottish Power will make huge sums of money from consumers selling power with state subsidies and underwriting of the power price. And yet they will be able to drive small holders, small businesses and local residents impecunious with impunity. We have been treated disgracefully throughout this process and object to the powers being granted in the manner sought. This is a case of "big business" using National Infrastructure regulations to treat individuals as inconsequential in the greater scheme of things, which is against both the letter and the spirit of the planning laws.	The project only requires temporary possession to implement the relevant works. Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.3 Barbara Jeffries (RR-455)

Table 6 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Barbara Jeffries RR-455	66	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of restrictive covenants

Table 7 Applicant's Comments on Barbara Jeffries' Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>I fear that if this is allowed to go ahead there will be an onslaught of at least six more substations and interconnectors following on in quick succession. (1) There will be cumulative impact on local communities of up to 7 energy projects occurring over the next 15 years. (2) Thorpeness cliffs are fragile and unsuitable as a site for landing cables (3/4). environmentally sensitive areas will be destroyed, where the cables are laid. (5) Trenches and haul roads are too close to residential homes (6) Impact on businesses. Loss of trade, visitor income, jobs which will lead to economic and social decline. (7) Traffic congestion and relates issues will deter tourism from coming to the area. (8) Local bird reserve at minsmere will be effected as migratory birds will be disorientated Effect on wildlife.</p> <p>I wish to object to these ill-concieved plans to carve up East suffolks unique counttryside from Thorpeness to Friston. (1) If these are allowed to go ahead there will be a further 6 more substations in quick succession.</p>	<p>The Applicant notes the comments made, they have also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared topic responses on these matters:</p> <ul style="list-style-type: none"> (1) Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects. (2) Please see Table 24 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – landfall. (3) Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology (4) Please see Table 33 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>(3,4,7) The reasons are because of the threat to wildlife and the important sandlings heath, the destruction of ancient woodland. The local road network is unsuitable for the high traffic levels and more HGVs. (9) Light pollution, Suffolks famous dark skies lost.</p> <p>(10) Noise pollutions Suffolks famous peace and tranquility lost. (11) Air pollution from traffoic and trenches dug through suffolks light sandy soil which blows away causing visibility hazard and health issues.</p> <p>(7) Increased traffic on roads, a danger to cyclists and residents.</p> <p>(7) Emergency services will be delayed, endangering lives. In the event of a nuclear incident routes would be severely hampered.</p> <p>(13) Permanent and temporary closure of public rights of way eg footpaths and bridleways (6) Impact on businesses, loss of trade, visitor income and jobs leading to social and econo mic decline.; (8) Effect on migrating birds and the effects on minsmere's famous bird reserve loss of wwislidlife , (6) tourism. (4) woodland (8) migrating birds (7) roads unsuitable (9) light (10) noise pollution (12) emergency services effected (6) trade topurism (13) closure of footpaths.</p>	<p>the Applicant's comments on Relevant Representations regarding woodland.</p> <p>(5) Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>(6) Please see Table 28 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – employment and skills.</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p> <p>(7) Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p> <p>(8) Please see Table 19 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p> <p>(9) Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements.</p> <p>(10) Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p> <p>(11) Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p> <p>(12) Please see Table 49 in Applicant's Comments on Relevant Representations Volume 3 (document reference ExA.RR3.D0.V1) for the Applicant's comments on Relevant Representations regarding Office for Nuclear Regulation.</p> <p>(13) Please see Table 23 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding public rights of way.</p>



2.4 DA Phillips Ltd (RR-031)

Table 8 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Ashtons Legal on behalf of D A Phillips & Co RR-031	89	Temporary Occupation and Use	as assumed owner
	79	Temporary Occupation and Use	in respect of right of way
	84	Temporary Occupation and Use	Owner
	82, 86	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of way
	83, 85	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner

Table 9 Applicant's Comments on DA Phillips Ltd's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	This representation is on behalf of The Mann Family, trading as Manor Farm, Knodishall. The Landowners collectively own and/or occupy land at Manor Farm, Knodishall, Saxmundham.	Noted
002	The consequence of each DCO is that SPR will be taking some of their land at Manor Farm to accommodate a temporary Haul Road and a temporary works compound, as well as requiring a permanent easement for underground cabling.	<p>The <i>draft Development Consent Order (DCO)</i> (APP-023) describes the authorised development associated this land as follows:</p> <ul style="list-style-type: none"> Work No. 26 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and cable ducts laid underground from Work No. 23 to Work No. 31 and crossing Snape Road (B1069) together with the construction of a haul road and access and the formation of a new access at Snape Road (B1069);



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • Work No. 27 — temporary construction consolidation sites and construction access; • In response the Applicant lists out the Plots and rational behind rights being acquired for each the respondent refers to: • Plot 79 - A public footpath will be temporarily diverted through this land. • Plots 82, 83 and 85 - Permanent rights to install, maintain and access cables are sought as well as permanent rights of access in order to access the area of permanent ecological mitigation. • Plot 84 - This land will be used temporarily for a Construction Consolidation Site (CCS) to serve construction activities. • Plot 86 - Permanent rights of access are sought; and • Plot 89 - Temporary use of the bridleway will be made with non-Heavy Goods Vehicles (HGVs) for onshore preparation works.
003	<p>The Landowners do not object to the principle of the provision of additional off shore wind farm capacity in the North Sea but object to the taking and use of their land on the grounds that it has not been demonstrated that the public interest outweighs the impact on their holding.</p>	<p>As presented in the Statement of Reasons (APP-026), a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one only if the Secretary of State is satisfied that:</p> <ul style="list-style-type: none"> • The land is required for the development to which the development consent relates; • The land is required to facilitate or is incidental to that development; or • The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The landowner's land is required for the development to which the consent relates as it is required to install, operate and maintain the cables and for a compound required to facilitate the development.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>It is also necessary for the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily.</p> <p>Over-arching policy drivers and need for the project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p> <p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> • Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018¹) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify. • In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017²) sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increased offshore wind capacity to 30GW by 2030, which represents an increase from the approximately 8GW</p>

¹ Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1.pdf [Accessed 21/05/2019].

² Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2019].



No.	Relevant Representation	Applicant's Comments
		<p>currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030.</p> <p>The East Anglia TWO and East Anglia ONE North projects will have a generating capacity estimated at 900 Mega Watts (MW³) and 800 Mega Watts (MW⁴) respectively and have the potential to make a substantial contribution to UK 2030 energy targets by meeting approximately 2.25⁵% and 2⁶% respectively of the UK offshore wind cumulative deployment target for 2030 (section 5.1.7 of the Development Consent and Planning Statement).</p> <p>Moreover, the East Anglia TWO and East Anglia ONE North projects would have a direct positive impact by securing renewable energy supply for the equivalent of approximately 800,000⁷ and 710,000⁸ UK households respectively. The Projects would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Projects.⁹</p>

³ As measured at point of connection of the onshore cables to the onshore substation.

⁴ As measured at point of connection of the onshore cables to the onshore substation

⁵ Based on 900MW / 40,000MW x 100

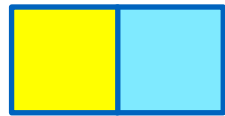
⁶ Based on 800MW / 40,000MW x 100

⁷ Calculated taking the number of megawatts (900) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 800,416 homes

⁸ Calculated taking the number of megawatts (800) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 710,945 homes

⁹ Page 27 of UK Government Offshore Wind Sector Deal

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
004	The DCO provides for taking an important part of their landholding and the impact on their business will be so severe that an alternative route for the haul road, compound and cabling corridor must be found.	<p>The Compulsory Acquisition Guidance details some general considerations for the justification of compulsory acquisition powers within a DCO. An applicant for compulsory acquisition powers should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored. In relation to the representation on the location of the onshore cable route, this is a matter that was given careful consideration at the site selection stage and has also been raised by a number of individual representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 25 in Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>In relation to the comment on the location of the haul road and CCS, Chapter 26 Traffic and Transport (APP-074) presents a comprehensive traffic and transport impact assessment, part of which has assessed the suitability of various routes to the onshore development area. Heavy Goods Vehicles (HGV) will access the onshore development area via defined routes set out in Chapter 26 Traffic and Transport (APP-074), all of which are Strategic Lorry Routes or Zone distributor routes which is compliant with the route hierarchy for the whole of Suffolk which has been developed by Suffolk County Council to encourage HGV drivers to use the most appropriate route according to their destination.</p> <p>Access to the onshore substation and National Grid substation during construction is off the B1069 (Snape Road), which forms part of the Suffolk County Council's Zone distributor routes for HGVs. Considering the routing of the onshore cable corridor and the classification of the B1069 (Snape Road) as a zone distributor routes, it is appropriate to establish the onshore cable route and substation construction haul road from Snape Road. By combining access of for the onshore cable route and the onshore substation/National Grid substation it avoids the need for a second temporary access to be established to serve the onshore substation/National Grid substation. There is a need to</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>establish CCSs close to the public road in order to minimise travel distances of road based vehicles along the temporary haul roads where practicable. This allows road based delivery vehicles to make larger deliveries to a CCS, where they deliveries would be broken down and dispatched to the work area on smaller vehicles, typically along the temporary haul roads, thereby removing vehicle movements from the public road.</p> <p>The routing of the onshore cable corridor has by definition (Please see Table 25 in Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route) also generated the routing of the onshore cable route and substation construction haul road route. Key onshore cable route selection principles adopted for the onshore cable corridor apply equally to the routing of the onshore cable route and substation construction haul road route, namely:</p> <ul style="list-style-type: none"> • Avoid residential titles (including whole garden) where possible; • Avoid direct significant impacts to internationally and nationally designated areas (e.g. Special Areas of Conservation (SACs), Special protection Areas (SPAs), and Sites of Special Scientific Interest (SSSIs) etc.) where possible; • Minimise significant impacts to the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty; • Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction; • Minimise interaction with mature woodland; • Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting risk associated with interfering with another DCO proposal (statutory undertaker); • The onshore cable corridor / route (and therefore consideration of substation and landfall siting) should be kept as straight and as short as practicable;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

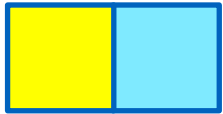
No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Minimise the number and length of trenchless techniques such as horizontal direction drills (HDDs) (see Chapter 6 Project Description (APP-054); Minimise the number of crossings of assets (e.g. utilities) (assessed on a case-by-case basis); and All other policy and environmental constraints have been considered on a case-by-case basis (with consideration of appropriate mitigation). <p>The positioning of a CCS at Work No. 27 ensures the CCS is located within a single field, is close to the B1069, is a sufficient distance from residential properties to minimise impacts and is strategically placed to service both the onshore cable corridor and the onshore substation/National Grid substation.</p> <p>The permanent rights sought are to install onshore cables, together with a right of access to the cables for maintenance as described above. Once the cables are installed and the land has been reinstated, normal agricultural operations and recommence.</p> <p>The land that will be used temporarily for the CCS and the haul road are to serve construction activities. Once the construction is completed and the land has been reinstated, normal agricultural operations and recommence.</p>
005	Without prejudice to the foregoing, SPR has failed to provide the Landowners with sufficient information, including in particular, as to likely timings for entry, field and other surface water run-off, drainage arrangements, depths of cables, capacity for continued capacity for use for the Landowners' business, soil management during and after construction, and remedial works. This represents a failure to consult properly with and work with the owners of land affected by each DCO proposal.	<p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to so.</p> <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners, occupiers and representatives to continue to communicate likely timings of construction and proposed entry dates giving as much notice as practical.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>There is a commitment to produce a Surface Water and Drainage Management Plan as part of the outline Code of Construction Plan (oCoCP) (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan is will be made available when it is possible to do so.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to pre and post construction drainage strategies and works. As described in the Chapter 6 Project Description (APP-054) the onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural activities over the cables. In Chapter 21 Land Use (APP-069), it advises that the operational phase impacts to agricultural land arising from the operation of the landfall and onshore cable routes are limited to the narrow strip of land above the onshore cables, over which the Applicant is likely to acquire cable protection rights. The Applicant will seek to ensure as far as possible that agricultural activities along the onshore cable route can continue during the operational period (section 21.6.2.1.1).</p> <p>The Applicant has committed to undertaking discussions with landowners regarding potential future land uses and any restrictions on these as part of ongoing discussions between landowners and the Applicant.</p> <p>There is a commitment to produce a Soil Management Plan is made in the outline Code of Construction Plan submitted as part of the Application. The Soil Management Plan will be made available when it is possible to do so.</p> <p>In the OCoCP (APP-578) it states that Restoration of land will be controlled under the requirements of the DCO. Any land used temporarily for construction is to be reinstated to its former condition, or such condition as the Local</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Planning Authority may approve. Reinstatement associated with roads will be undertaken in consultation with the local highway authority where relevant. All reinstatement will be undertaken as soon as reasonably practical and within twelve months of completion of the relevant stage of the onshore works or such other period as agreed with the Local Planning Authority.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the reinstatement and remedial works.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.5 Elizabeth Everett (RR-311)

Table 10 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Elizabeth Everett RR-311	62	Temporary Occupation and Use	in respect of right of way
	64	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of way

Table 11 Applicant's Comments on Elizabeth Everett's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>The mature trees opposite my bungalow will be killed by the cable work planned to go right through the wood.</p> <p>The wood is home to many species of birds including jays, long tailed tits etc, plus deer & squirrels. Even if the trees are replaced, they will take years to mature. I will never see that in my lifetime. This is the most beautiful place to live.</p>	<p>The Applicant notes the comments made and these matters have also been raised by a number of individual Relevant Representations. The Applicant has therefore prepared topic responses on these matters:</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape - cable route.</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p> <p>Please see Table 19 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p> <p>Please see Table 33 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding woodland.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
002	The idea that my dog will continually bark as she always lets me know when there is someone in the lane or nearby is very distressing for both her and me.	The Applicant notes the comment and the potential effect of the Projects on human health. The Applicant has therefore prepared a topic response on these matters: Please see Table 10 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding human health.
003	I am all for renewable energy but there is a right place for everything and through the beautiful Suffolk countryside is not one of them. There is land available at Sizewell - use it!	The onshore substation site selection process has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter. Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations

2.6 Fielden Ltd (RR-041)

Table 12 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Ashtons Legal on behalf of Fielden Ltd RR-041	89	Temporary Occupation and Use	as assumed owner
	84	Temporary Occupation and Use	in respect of right to use service media and restrictive covenants
	79	Temporary Occupation and Use	Owner
	83, 85	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right to use service media and restrictive covenants
	82, 86, 87, 88	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner

Table 13 Applicant's Comments on Fielden Ltd's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>The Landowners own land at Bulls Hall, lying to the west of Snape Road, Friston, Saxmundham.</p> <p>The consequence of each DCO is that SPR is seeking to take some of their land at Bulls Hall to accommodate a temporary Haul Road, as well as requiring a permanent easement for underground cabling. In addition SPR is seeking other land for use for mitigation of the adverse environmental effects of its schemes.</p>	<p>The <i>draft DCO</i> (APP-023) describes the authorised development associated with this land as follows:</p> <p>Work No. 25 — construction of bridleway to the west of Snape Road (B1069) connecting to the existing bridleway to the north including drainage works and fencing.</p> <p>Work No. 26 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and cable ducts laid underground from Work No. 23 to Work No. 31 and crossing Snape Road (B1069) together with the construction of a haul road and access and the formation of a new access at Snape Road (B1069).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Work No. 28 — ecological mitigation works in accordance with the ecological management plan and associated access.</p> <p>The following plots and rights sought are associated with this land:</p> <p>Plot 79 - A public footpath will be temporarily diverted through this land.</p> <p>Plots 83 and 85 - Permanent rights to install, maintain and access cables are sought as well as permanent rights of access in order to access the area of permanent ecological mitigation.</p> <p>Plot 84 - This land will be used temporarily for a Construction Consolidation Site (CCS) to serve construction activities.</p> <p>Plot 89 - Temporary use of the bridleway will be made with non-Heavy Good Vehicles (HGVs) for onshore preparation works.</p>
002	<p>The Landowners do not object to the principle of the provision of additional off shore wind farm capacity in the North Sea but do not accept that SPR has demonstrated an overriding public interest which justifies the taking and use of their land.</p>	<p>As presented in the Statement of Reasons (APP-026), a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one, only if the Secretary of State is satisfied that:</p> <ul style="list-style-type: none"> • The land is required for the development to which the development consent relates; • The land is required to facilitate or is incidental to that development; or • The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The landowner's land is required for the development to which the consent relates as it is required to install, operate and maintain the cables and for ecological mitigation works.</p> <p>As described above, acquisition of land to include permanent rights and temporary possession being sought are fundamental to the implementation of the Order. The Applicant has had due regard for various route options and a route optioneering</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>process was undertaken and this determined that the proposed route is most appropriate.</p> <p>It is also necessary for the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily or the creation of new a right.</p> <p>Over-arching policy drivers and need for the project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p> <p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> • Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018¹⁰) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify. • In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017¹¹) sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increased offshore wind capacity to 30GW by 2030, which represents an increase from</p>

¹⁰ Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1.pdf [Accessed 21/05/2019].

¹¹ Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2019].



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>the approximately 8GW currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030.</p> <p>The East Anglia TWO and East Anglia ONE North projects will have a generating capacity estimated at 900 Mega Watts (MW¹²) and 800 Mega Watts (MW¹³) respectively and have the potential to make a substantial contribution to UK 2030 energy targets by meeting approximately 2.25¹⁴% and 2¹⁵% respectively of the UK offshore wind cumulative deployment target for 2030 (section 5.1.7 of the Development Consent and Planning Statement).</p> <p>Moreover, the East Anglia TWO and East Anglia ONE North projects would have a direct positive impact by securing renewable energy supply for the equivalent of approximately 800,000¹⁶ and 710,000¹⁷ UK households respectively. The Projects would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Projects.¹⁸</p>

¹² As measured at point of connection of the onshore cables to the onshore substation.

¹³ As measured at point of connection of the onshore cables to the onshore substation

¹⁴ Based on 900MW / 40,000MW x 100

¹⁵ Based on 800MW / 40,000MW x 100

¹⁶ Calculated taking the number of megawatts (900) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 800,416 homes

¹⁷ Calculated taking the number of megawatts (800) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 710,945 homes

¹⁸ Page 27 of UK Government Offshore Wind Sector Deal

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

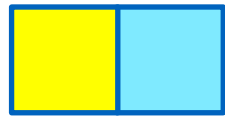
No.	Relevant Representation	Applicant's Comments
003	The Landowners contend that alternative routes and site options have not been considered properly.	<p>As presented in the Statement of Reasons (APP-026), the Compulsory Acquisition Guidance details some general considerations for the justification of compulsory acquisition powers within a DCO. An applicant for compulsory acquisition powers should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored.</p> <p>The Applicant has had due regard for various route options and a route optioneering process was undertaken and this determined that the proposed route is most appropriate. This matter that was given careful consideration at the site selection stage and has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 24 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – landfall.</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p>
004	SPR's proposals will result in unacceptable damage and destruction to a large areas of bio-diverse countryside which is of significant heritage value.	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p> <p>Please see Table 19 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Please see Table 4 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cultural heritage.
005	The Landowners believe that the process for selecting sites and the route corridor is so seriously flawed that the DCOs should not proceed. SPR's grounds for dismissing, in particular, the brownfield area at Sizewell adjacent to the cable landing point and National Grid extension are fundamentally unsound and that its rejection simply because of the difficulties in dealing with EDF is a wholly unsatisfactory basis on which proper planning for SPR's projects should be allowed to proceed. The reality of an AONB designation should be better taken into account, namely existing blight and environmental damage by the car parking, sub-stations and inadequate previous mitigation attempts at the existing power stations.	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p> <p>There are two sections within Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations. of particular relevance to this comment.</p> <p>The first of which is 'Process for substation site selection and consideration of alternative substation locations', and includes the following:</p> <p>National Grid provided a grid connection for the East Anglia TWO and East AngliaONE North projects in the vicinity of Sizewell and Leiston, Suffolk. Section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Connection and Infrastructure Options Note (CION) process and the work undertaken by the Applicant with National Grid to establish a grid connection location. The CION process considers the total life cost of the connection assessing both the capital and projected operational costs to the onshore network (over a project's lifetime) to determine the most economic and efficient design option. This is a principle driver for the location of substations. Table 4.3 provides a summary of the optioneering within this process.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The Applicant has followed NPS EN-1, NPS EN-3, NPS EN-5 the Electricity Act 1989 and National Grid's Guidelines on Substation Siting and Design (Horlock Rules) with the following aims:</p> <ul style="list-style-type: none"> Onshore substation to be positioned as close to the existing National Grid overhead lines as possible to reduce the requirement for cabling; and Onshore substation and National Grid substation to be positioned to deliver an efficient and economic system. <p>Paragraph 2.6.34 of EN-3 makes it clear that Applicant must work within the regulatory regime for offshore transmission networks established by Ofgem. The Applicant has done this and has gone through the appropriate processes for the siting of the grid connection in line with the regulatory framework.</p> <p>The initial onshore study area encompassed an area within a 1km buffer of the overhead line route into Sizewell. This was to ensure that any potential options, at a less economic and efficient distance from the overhead line, would still be captured and considered. Section 4.9.1.2.4 describes the subsequent review and refinement of this initial study area.</p> <p>Within the onshore study area, seven zones were identified as potential substation sites, based on available space to accommodate the required project (section 4.9.1.3). Additionally, a 'target' buffer of 250m from residential properties was applied as a proxy for minimising disturbance to residents.</p> <p>The seven potential substation zones were scored using a Red / Amber / Green (RAG) assessment (Appendix 4.2 (APP-443)) against criteria agreed with statutory consultees. These included archaeology / heritage, ecology, landscape, hydrology and hydrogeology, engineering, community, landscape and visual, property and planning. The RAG assessment did not identify the chosen onshore substation site, rather it was a tool that allowed a number of sites to be compared and the most acceptable sites identified at the time to progress to further assessment stages.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The culmination of the various work streams as described in section 4.9.1.3 enabled the Applicants to decide that the substation zone northeast of Friston (Zone 7) as the proposed zone to be taken forward.</p> <p>Phase 3.5 Consultation (section 4.9.1.6 of Chapter 4 Site Selection and Assessment of Alternatives) enabled the Applicant to engage with local communities and consultees on the opportunity to consider an alternative substation site at Broom Covert, Sizewell (Zone 8) in parallel with proposals for a substation site at Grove Wood, Friston (Zone 7).</p> <p>As set out in section 4.9.1.6., there are significant differences between the proposed onshore substations sites Grove Wood, Friston and Broom Covert, Sizewell:</p> <ul style="list-style-type: none"> • Presence of Broom Covert, Sizewell within the Suffolk Coast and Heaths AONB, contrary to NPS EN-1 and NPPF policy, presenting a significant consenting risk to the project. A suitable alternative outside the Suffolk Coast and Heaths AONB exists (Grove Wood, Friston) and therefore exceptional circumstances do not exist to site within the AONB. • The Broom Covert, Sizewell site is located within the AONB (which is contrary to the NPS EN-1 policy) and siting in the Broom Covert, Sizewell site is likely to result in significant effects on some of the special qualities of the AONB; • Significant risk of Compulsory Acquisition Powers not being available to SPR at the Broom Covert, Sizewell site (due to the proximity to Sizewell B Nuclear Power Station and Galloper Offshore Wind Farm statutory undertaker land and the use of the site as reptile mitigation land for the proposed Sizewell C New Nuclear Power Station development • The need to secure replacement reptile mitigation land for the Sizewell C New Nuclear Power Station development on a voluntary basis, without the ability to secure land by compulsory acquisition (as land would need to be secured prior to SPR's compulsory acquisition rights being made available to allow its use by EDF); and



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Additional costs incurred in laying an additional 6km cable length to Grove Wood, Friston. <p>The Broom Covert, Sizewell site presented significant policy challenges toward gaining consent which outweighed the increased cost of further cabling to the Grove Wood, Friston site. It is the Applicant's position, in accordance with policies set out in NPS EN-1 and based on extensive advice and stakeholder engagement that the Grove Wood, Friston site offers the most appropriate option for the siting of onshore substations and National Grid infrastructure (section 4.9.1.7). .</p> <p>The second section of particular relevance is Compulsory acquisition powers for land associated with Sizewell C in the Applicant's response to Site Selection - onshore substations (ref no) advises that includes the following:</p> <p>Section 4.9.1.2.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Applicant's early engagement with EDF Energy regarding land at Sizewell C. This commenced in May 2017 and included discussions on the availability of land within the EDF Energy estate for inclusion within the Onshore Site Selection Study Area for siting of substations.</p> <p>EDF Energy clarified that any land associated with the Sizewell C New Nuclear Power Station development was not available for voluntary acquisition due to the large proportion of land required to compensate and mitigate potential ecological impacts associated with the Sizewell C New Nuclear Power Station development. Discussion with EDF Energy confirmed that work in these areas is already underway. Therefore, it was concluded that there was no reasonable prospect of the necessary certificate or compulsory acquisition powers over this land being obtained.</p> <p>The Applicant would therefore be required to rely upon seeking and exercising powers of compulsory acquisition over EDF Energy land for onshore substation siting through the DCO process. EDF Energy has advised the Applicant that it is unable to accept the imposition of compulsory acquisition powers over its land given their need to protect the safety and security of Sizewell B Nuclear Power Station. As such, significant</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		objections were likely to be raised by EDF Energy to the Applicant's Application which would require the necessary compulsory acquisition of EDF Energy land.
006	SPR's initial time scale of 2 years for installation of cables was misleading and has now stretched to 13 years, resulting in a different magnitude of disruption for what is now the only haul route and the location of the largest construction compound. There needs to be a fundamental reappraisal of SPR's plans.	<p>Chapter 6 - Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months. Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months. National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>The haul road that affects this land is to facilitate the construction of the substations and the indication of construction duration is up to 48 months.</p> <p>For the compound referred to, the indication of construction duration is also up to 48 months. However, it is not located on land owned by this landowner</p> <p>The draft Development Consent Orders require each Project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The East Anglia TWO project and East Anglia ONE North project are two separate projects which are the subject of two separate Applications.</p> <p>At this stage it is not known whether both projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative assessment scenarios which are</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p> <ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>In fully assessing the above scenarios within each ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.</p>
007	<p>SPR has not provided sufficient information about the scale of the Eastern Energy Hub nor for plans for future expansion.</p>	<p>A cumulative impact assessment (CIA) has been carried out for each of the considered receptor topics in chapters 7 to 30 (APP 055-078) of the Environmental Statement. The approach used for the CIA follows Planning Inspectorate Advice Note 17. Where it is helpful to do so 'Tiers' of these projects' development statuses have been defined as well as the availability of information to be used within the CIA. This approach is based on the three tier system proposed in Planning Inspectorate Advice Note 17 as summarised in the following:</p> <ul style="list-style-type: none"> Tier 1 – Projects under construction, permitted or submitted applications; Tier 2 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has</u> been submitted; and Tier 3 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has not</u> 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. <p>Tier 1 and Tier 2 projects are included in all relevant CIAs within the ES. Generally, Tier 3 projects have not been included within each CIA due to insufficient information available on which to base an assessment, in line with Advice Note 17.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p><u>Projects not considered</u></p> <p>Following the guidance in Advice Note 17, the below projects were not considered in the CIA because at the time the Project CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales):</p> <ul style="list-style-type: none"> • Nautilus; • EuroLink; • Greater Gabbard Offshore Windfarm Extension; and • Galloper Offshore Windfarm Extension. <p>Each of these projects is nationally significant and therefore will require its own EIA and as part of that process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Project in each of their respective EIAs as they progress through the planning process.</p> <p>ScottishPower Renewables (of which the Applicant is a wholly owned subsidiary) is proposing to construct its future offshore windfarms, East Anglia THREE, East Anglia TWO and East Anglia ONE North, as a new 'East Anglia Hub' and this been raised by a number of individual representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 6 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding East Anglia Hub.</p>
008	SPR is seeking the ability to pass rights to third parties which means that continued blight and/or expansion is in mind; this is unacceptable.	In order to successfully deliver these projects, the Applicant does require the ability to assign rights to third parties like an Offshore Transmission Owner (OFTO), National Grid or a sub-contractor, however, any rights sought via the Application are limited to those required for delivery of the Projects only.
009	SPR has not provided sufficient information in consultation documents.	This is a matter that has also been raised in other Relevant Representations and a topic response has been prepared:

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
		<p>Please see Table 1 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding adequacy of consultation.</p> <p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to do so.</p>
010	National Grid's major involvement in the scheme with its own substation and relocation of pylons is not noted anywhere in the DCO and has not been subject to proper accountability in the consultation process, which has been poorly managed. These failures must be considered as part of this DCO process.	<p>National Grid infrastructure forms part of the Application as described in (Chapter 6 Project Description (APP-054)). National Grid is a development partner for the Project and the Applicant has engaged in consultation on behalf of National Grid.</p> <p>The Applicant does not accept that National Grid is not included in the draft DCO (APP-023), for example descriptions of the National Grid works in the Application, please refer to the draft DCO (APP-023), Work No 34, Work Nos 38 to 43.</p>
011	Inadequate consideration has been given to the transport network, including locations where there are currently problems even for existing traffic (eg, on the A1094 at Friday Street railway bridge, Snape-Watering hill, approaching Wood Lane at Snape and the B1069 at Park Farm Cottages and Bulls Hall Cottages).	<p>In relation to this comment on current problems with existing traffic, pre-application technical engagement was undertaken via the Traffic and Transport Expert Topic Group (ETG), described within Chapter 5 EIA Methodology (APP-054). Meetings were held in April 2018, May 2018, July 2018, September 2018, January 2019 and May 2019. The Traffic and Transport ETG stakeholder membership comprised the relevant technical leads from East Suffolk Council (ESC), Suffolk County Council (SCC) and Highways England (HE). The ETG discussed and agreed the methodology for the assessment and the assumptions within it. The ETG agreed that the survey window to establish the baseline traffic counts should be representative of the existing environment. The assessment is based on the percentage of extra traffic over the baseline.</p> <p>Chapter 26 - Traffic and Transport (APP-074) provides an assessment of the traffic and transport effects of the Project. In addition, Appendices 26.1 – 26.26 (APP-527 - APP-552) provide further information on detailed aspects of this assessment.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

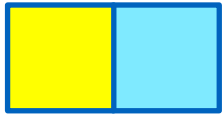
No.	Relevant Representation	Applicant's Comments
		<p>The A1094 from the A12 to Snape is identified as Link 6a; the A1094 through Snape as Link 6b. Link 6b is allocated a High sensitivity. The junction of A1094 and B1069 is assessed for collision data in section 26.5.4.2.4 as Cluster 4.</p> <p>This is a matter that has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 31 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
012	The proposals will come at a considerable cost to the community by damage to agricultural and tourism industries which will be permanent and not off-set by employment for energy purposes. Compensation is an inadequate remedy for the harm caused to people's property and livelihoods.	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 30 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p> <p>Please see Table 11 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding land use.</p> <p>Please see Table 29 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – house prices.</p>
013	SPR has failed to provide the Landowners with sufficient information, including in particular, likely timings for works to commence and complete, and depths of cables. This represents a failure to consult properly with and work with the owners of land affected by each DCO proposal.	<p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to do so.</p> <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners, occupiers and representatives to continue to communicate likely timings of construction.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Chapter 6 of the ES (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months. Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months. National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>As described in the Chapter 6 Project Description (AP-054) the onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural soil over the cables.</p>
014	<p>This has exacerbated more general failures in the consultation process, with inadequate information being given to affected individuals and communities. Indeed the consultation process has been so flawed that the DCO process should be stopped and SPR made to re-examine its proposals and then consult properly.</p>	<p>The Applicant has undertaken comprehensive consultation as set out in the Consultation Report (APP-029) and of particular reference to this representation, Consultation Report - Appendix 10 - Landowner and Statutory Undertaker Consultation (APP-040).</p> <p>This is a matter that has also been raised in other Relevant Representations and a topic response has been prepared:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Please see Table 1 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding adequacy of consultation.



2.7 Graeme John Bloomfield (RR-152)

Table 14 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Ashtons Legal on behalf of Graeme Bloomfield RR-152	79	Temporary Occupation and Use	in respect of right of way, rights of access to maintain utility mains and restrictive covenants
	78, 81	Temporary Occupation and Use	Owner
	77	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner (in respect of subsoil beneath half width of public highway)
	82, 86	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of way, rights of access to maintain utility mains and restrictive covenants
	80	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner

Table 15 Applicant's Comments on Graeme John Bloomfield's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>The Landowners own land at Bulls Hall, lying to the west of Snape Road, Friston, Saxmundham.</p> <p>The consequence of each DCO is that SPR is seeking to take some of their land at Bulls Hall to accommodate a temporary Haul Road, as well as requiring a permanent easement for underground cabling. In addition SPR is</p>	<p>The <i>draft Development Consent Order (DCO)</i> (APP-023) describes the authorised development associated with this land as follows:</p> <p>Work No. 25 — construction of bridleway to the west of Snape Road (B1069) connecting to the existing bridleway to the north including drainage works and fencing.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	seeking other land for use for mitigation of the adverse environmental effects of its schemes.	<p>Work No. 26 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and cable ducts laid underground from Work No. 23 to Work No. 31 and crossing Snape Road (B1069) together with the construction of a haul road and access and the formation of a new access at Snape Road (B1069).</p> <p>Work No. 28 — ecological mitigation works in accordance with the ecological management plan and associated access.</p> <p>As detailed in the Statement of Reasons (APP-026) the Applicant lists out the Plots and rational behind rights being acquired for each the respondent refers to:</p> <p>Plot 77 - permanent rights are sought to install onshore cables, together with a right of access to the cables for maintenance.</p> <p>Plot 80 – permanent rights to install, maintain and access cables are sought as well as permanent rights of access in order to access the area of permanent ecological mitigation. A public footpath will be temporarily diverted through this land.</p> <p>Plot 82 - permanent rights to install, maintain and access cables are sought as well as permanent rights of access in order to access the area of permanent ecological mitigation.</p> <p>Plot 86 - permanent rights of access are sought in order to access the area of permanent ecological mitigation.</p> <p>On plots 78, 79, and 81, a public footpath will be temporarily diverted through this land.</p>
002	The Landowners do not object to the principle of the provision of additional off shore wind farm capacity in the North Sea but do not accept that SPR has demonstrated an overriding public interest which justifies the taking and use of their land.	<p>As presented in the Statement of Reasons (APP-026), a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one, only if the Secretary of State is satisfied that:</p> <ul style="list-style-type: none"> The land is required for the development to which the development consent relates;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> The land is required to facilitate or is incidental to that development; or The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The landowner's land is required for the development to which the consent relates as it is required to install, operate and maintain the cables and for ecological mitigation works.</p> <p>As described above, acquisition of land to include permanent rights and temporary possession being sought are fundamental to the implementation of the Order. The Applicant has had due regard for various route options and a route optioneering process was undertaken and this determined that the proposed route is most appropriate.</p> <p>It is also necessary for the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily or the creation of new a right.</p> <p>Over-arching policy drivers and need for the project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p> <p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018¹⁹) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify.

¹⁹ Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1_.pdf [Accessed 21/05/2019].



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017²⁰) sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increased offshore wind capacity to 30GW by 2030, which represents an increase from the approximately 8GW currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030.</p> <p>The East Anglia TWO and East Anglia ONE North projects will have a generating capacity estimated at 900 Mega Watts (MW²¹) and 800 Mega Watts (MW²²) respectively and have the potential to make a substantial contribution to UK 2030 energy targets by meeting approximately 2.25²³% and 2²⁴% respectively of the UK offshore wind cumulative deployment target for 2030 (section 5.1.7 of the Development Consent and Planning Statement).</p> <p>Moreover, the East Anglia TWO and East Anglia ONE North projects would have a direct positive impact by securing renewable energy supply for the equivalent of</p>

²⁰ Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2019].

²¹ As measured at point of connection of the onshore cables to the onshore substation.

²² As measured at point of connection of the onshore cables to the onshore substation

²³ Based on 900MW / 40,000MW x 100

²⁴ Based on 800MW / 40,000MW x 100



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		approximately 800,000 ²⁵ and 710,000 ²⁶ UK households respectively. The Projects would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Projects. ²⁷
003	The Landowners contend that alternative routes and site options have not been considered properly.	<p>As presented in the Statement of Reasons (APP-026), the Compulsory Acquisition Guidance details some general considerations for the justification of compulsory acquisition powers within a DCO. An applicant for compulsory acquisition powers should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored.</p> <p>The Applicant has had due regard for various route options and a route optioneering process was undertaken and this determined that the proposed route is most appropriate. This matter that was given careful consideration at the site selection stage and has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 24 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – landfall.</p>

²⁵ Calculated taking the number of megawatts (900) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 800,416 homes

²⁶ Calculated taking the number of megawatts (800) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 710,945 homes

²⁷ Page 27 of UK Government Offshore Wind Sector Deal

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

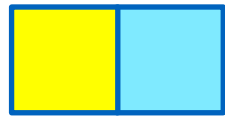
No.	Relevant Representation	Applicant's Comments
		<p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p>
004	SPR's proposals will result in unacceptable damage and destruction to a large areas of bio-diverse countryside which is of significant heritage value.	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p> <p>Please see Table 19 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p> <p>Please see Table 4 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cultural heritage.</p>
005	The Landowners believe that the process for selecting sites and the route corridor is so seriously flawed that the DCOs should not proceed. SPR's grounds for dismissing, in particular, the brownfield area at Sizewell adjacent to the cable landing point and National Grid extension are fundamentally unsound and that its rejection simply because of the difficulties in dealing with EDF is a wholly unsatisfactory basis on which proper planning for SPR's projects should be allowed to proceed. The reality of an AONB designation should be better taken into account, namely existing blight and environmental damage by the car parking, sub-stations	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p> <p>There are two sections within Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

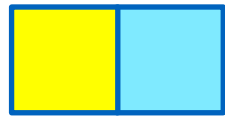
No.	Relevant Representation	Applicant's Comments
	and inadequate previous mitigation attempts at the existing power stations.	<p>Applicant's comments on Relevant Representations regarding site selection – onshore substations. of particular relevance to this comment.</p> <p>The first of which is 'Process for substation site selection and consideration of alternative substation locations', and includes the following:</p> <p>National Grid provided a grid connection for the East Anglia TWO and East Anglia ONE North projects in the vicinity of Sizewell and Leiston, Suffolk. Section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Connection and Infrastructure Options Note (CION) process and the work undertaken by the Applicant with National Grid to establish a grid connection location. The CION process considers the total life cost of the connection assessing both the capital and projected operational costs to the onshore network (over a project's lifetime) to determine the most economic and efficient design option. This is a principle driver for the location of substations. Table 4.3 provides a summary of the optioneering within this process.</p> <p>The Applicant has followed NPS EN-1, NPS EN-3, NPS EN-5 the Electricity Act 1989 and National Grid's Guidelines on Substation Siting and Design (Horlock Rules) with the following aims:</p> <ul style="list-style-type: none"> Onshore substation to be positioned as close to the existing National Grid overhead lines as possible to reduce the requirement for cabling; and Onshore substation and National Grid substation to be positioned to deliver an efficient and economic system. <p>Paragraph 2.6.34 of EN-3 makes it clear that Applicant must work within the regulatory regime for offshore transmission networks established by Ofgem. The Applicant has done this and has gone through the appropriate processes for the siting of the grid connection in line with the regulatory framework.</p> <p>The initial onshore study area encompassed an area within a 1km buffer of the overhead line route into Sizewell. This was to ensure that any potential options, at a less economic and efficient distance from the overhead line, would still be captured</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>and considered. Section 4.9.1.2.4 describes the subsequent review and refinement of this initial study area.</p> <p>Within the onshore study area, seven zones were identified as potential substation sites, based on available space to accommodate the required project (section 4.9.1.3). Additionally, a 'target' buffer of 250m from residential properties was applied as a proxy for minimising disturbance to residents.</p> <p>The seven potential substation zones were scored using a Red / Amber / Green (RAG) assessment (Appendix 4.2 (APP-443)) against criteria agreed with statutory consultees. These included archaeology / heritage, ecology, landscape, hydrology and hydrogeology, engineering, community, landscape and visual, property and planning. The RAG assessment did not identify the chosen onshore substation site, rather it was a tool that allowed a number of sites to be compared and the most acceptable sites identified at the time to progress to further assessment stages.</p> <p>The culmination of the various work streams as described in section 4.9.1.3 enabled the Applicants to decide that the substation zone northeast of Friston (Zone 7) as the proposed zone to be taken forward.</p> <p>Phase 3.5 Consultation (section 4.9.1.6 of Chapter 4 Site Selection and Assessment of Alternatives) enabled the Applicant to engage with local communities and consultees on the opportunity to consider an alternative substation site at Broom Covert, Sizewell (Zone 8) in parallel with proposals for a substation site at Grove Wood, Friston (Zone 7).</p> <p>As set out in section 4.9.1.6., there are significant differences between the proposed onshore substations sites Grove Wood, Friston and Broom Covert, Sizewell:</p> <ul style="list-style-type: none"> • Presence of Broom Covert, Sizewell within the Suffolk Coast and Heaths AONB, contrary to NPS EN-1 and NPPF policy, presenting a significant consenting risk to the project. A suitable alternative outside the Suffolk



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

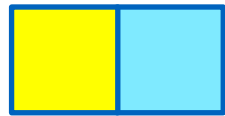
No.	Relevant Representation	Applicant's Comments
		<p>Coast and Heaths AONB exists (Grove Wood, Friston) and therefore exceptional circumstances do not exist to site within the AONB.</p> <ul style="list-style-type: none"> • The Broom Covert, Sizewell site is located within the AONB (which is contrary to the NPS EN-1 policy) and siting in the Broom Covert, Sizewell site is likely to result in significant effects on some of the special qualities of the AONB; • Significant risk of Compulsory Acquisition Powers not being available to SPR at the Broom Covert, Sizewell site (due to the proximity to Sizewell B Nuclear Power Station and Galloper Offshore Wind Farm statutory undertaker land and the use of the site as reptile mitigation land for the proposed Sizewell C New Nuclear Power Station development • The need to secure replacement reptile mitigation land for the Sizewell C New Nuclear Power Station development on a voluntary basis, without the ability to secure land by compulsory acquisition (as land would need to be secured prior to SPR's compulsory acquisition rights being made available to allow its use by EDF); and • Additional costs incurred in laying an additional 6km cable length to Grove Wood, Friston. <p>The Broom Covert, Sizewell site presented significant policy challenges toward gaining consent which outweighed the increased cost of further cabling to the Grove Wood, Friston site. It is the Applicant's position, in accordance with policies set out in NPS EN-1 and based on extensive advice and stakeholder engagement that the Grove Wood, Friston site offers the most appropriate option for the siting of onshore substations and National Grid infrastructure (section 4.9.1.7). .</p> <p>The second section of particular relevance is 'Compulsory acquisition powers for land associated with Sizewell C' in the Applicant's response to Site Selection - onshore substations (Table 26 in Applicant's Comments on Relevant</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Representations Volume 2 (document reference ExA.RR2.D0.V1)) includes the following:</p> <p>Section 4.9.1.2.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Applicant's early engagement with EDF Energy regarding land at Sizewell C. This commenced in May 2017 and included discussions on the availability of land within the EDF Energy estate for inclusion within the Onshore Site Selection Study Area for siting of substations.</p> <p>EDF Energy clarified that any land associated with the Sizewell C New Nuclear Power Station development was not available for voluntary acquisition due to the large proportion of land required to compensate and mitigate potential ecological impacts associated with the Sizewell C New Nuclear Power Station development. Discussion with EDF Energy confirmed that work in these areas is already underway. Therefore, it was concluded that there was no reasonable prospect of the necessary certificate or compulsory acquisition powers over this land being obtained.</p> <p>The Applicant would therefore be required to rely upon seeking and exercising powers of compulsory acquisition over EDF Energy land for onshore substation siting through the DCO process. EDF Energy has advised the Applicant that it is unable to accept the imposition of compulsory acquisition powers over its land given their need to protect the safety and security of Sizewell B Nuclear Power Station. As such, significant objections were likely to be raised by EDF Energy to the Applicant's Application which would require the necessary compulsory acquisition of EDF Energy land.</p>
006	SPR's initial time scale of 2 years for installation of cables was misleading and has now stretched to 13 years, resulting in a different magnitude of disruption for what is now the only haul route and the location of the largest construction compound. There needs to be a fundamental reappraisal of SPR's plans.	<p>Chapter 6 - Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months. National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>The haul road that affects this land is to facilitate the construction of the substations and the indication of construction duration is up to 48 months.</p> <p>For the compound referred to, the indication of construction duration is also up to 48 months. However, it is not located on land owned by this landowner</p> <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The East Anglia TWO project and East Anglia ONE North project are two separate projects which are the subject of two separate Applications.</p> <p>At this stage it is not known whether both projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p> <ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		In fully assessing the above scenarios within each ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.
007	SPR has not provided sufficient information about the scale of the Eastern Energy Hub nor for plans for future expansion.	<p>A cumulative impact assessment (CIA) has been carried out for each of the considered receptor topics in chapters 7 to 30 (APP 055-078) of the Environmental Statement. The approach used for the CIA follows Planning Inspectorate Advice Note 17. Where it is helpful to do so 'Tiers' of these projects' development statuses have been defined as well as the availability of information to be used within the CIA. This approach is based on the three tier system proposed in Planning Inspectorate Advice Note 17 as summarised in the following:</p> <ul style="list-style-type: none"> • Tier 1 – Projects under construction, permitted or submitted applications; • Tier 2 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has</u> been submitted; and • Tier 3 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has not</u> 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. <p>Tier 1 and Tier 2 projects are included in all relevant CIAs within the ES. Generally, Tier 3 projects have not been included within each CIA due to insufficient information available on which to base an assessment, in line with Advice Note 17.</p> <p><u>Projects not considered</u></p> <p>Following the guidance in Advice Note 17, the below projects were not considered in the CIA because at the time the Project CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales):</p> <ul style="list-style-type: none"> • Nautilus;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • EuroLink; • Greater Gabbard Offshore Windfarm Extension; and • Galloper Offshore Windfarm Extension. <p>Each of these projects is nationally significant and therefore will require its own EIA and as part of that process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Project in each of their respective EIAs as they progress through the planning process.</p> <p>ScottishPower Renewables (of which the Applicant is a wholly owned subsidiary) is proposing to construct its future offshore windfarms, East Anglia THREE, East Anglia TWO and East Anglia ONE North, as a new 'East Anglia Hub' and this has been raised by a number of individual representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 6 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding East Anglia Hub.</p>
008	SPR is seeking the ability to pass rights to third parties which means that continued blight and/or expansion is in mind; this is unacceptable.	In order to successfully deliver these projects, the Applicant does require the ability to assign rights to third parties like an Offshore Transmission Owner (OFTO), National Grid or a sub-contractor, however, any rights sought via the Application are limited to those required for delivery of the Projects only.
009	SPR has not provided sufficient information in consultation documents.	<p>This is a matter that has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 1 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding adequacy of consultation.</p> <p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to do so.</p>



No.	Relevant Representation	Applicant's Comments
010	National Grid's major involvement in the scheme with its own substation and relocation of pylons is not noted anywhere in the DCO and has not been subject to proper accountability in the consultation process, which has been poorly managed. These failures must be considered as part of this DCO process.	<p>National Grid infrastructure forms part of the Application as described in (Chapter 6 Project Description (APP-054)). National Grid is a development partner for the Project and the Applicant has engaged in consultation on behalf of National Grid.</p> <p>The Applicant does not accept that National Grid is not included in the draft DCO (APP-023), for example descriptions of the National Grid works in the Application, please refer to the draft DCO (APP-023), Work No 34, Work Nos 38 to 43.</p>
011	Inadequate consideration has been given to the transport network, including locations where there are currently problems even for existing traffic (eg, on the A1094 at Friday Street railway bridge, Snape-Watering hill, approaching Wood Lane at Snape and the B1069 at Park Farm Cottages and Bulls Hall Cottages).	<p>In relation to this comment on current problems with existing traffic, pre-application technical engagement was undertaken via the Traffic and Transport Expert Topic Group (ETG), described within Chapter 5 EIA Methodology (APP-054). Meetings were held in April 2018, May 2018, July 2018, September 2018, January 2019 and May 2019. The Traffic and Transport ETG stakeholder membership comprised the relevant technical leads from East Suffolk Council (ESC), Suffolk County Council (SCC) and Highways England (HE). The ETG discussed and agreed the methodology for the assessment and the assumptions within it. The ETG agreed that the survey window to establish the baseline traffic counts should be representative of the existing environment. The assessment is based on the percentage of extra traffic over the baseline.</p> <p>Chapter 26 - Traffic and Transport (APP-074) provides an assessment of the traffic and transport effects of the Project. In addition, Appendices 26.1 – 26.26 (APP-527 - APP-552) provide further information on detailed aspects of this assessment.</p> <p>The A1094 from the A12 to Snape is identified as Link 6a; the A1094 through Snape as Link 6b. Link 6b is allocated a High sensitivity. The junction of A1094 and B1069 is assessed for collision data in section 26.5.4.2.4 as Cluster 4.</p> <p>This is a matter that has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
012	The proposals will come at a considerable cost to the community by damage to agricultural and tourism industries which will be permanent and not off-set by employment for energy purposes. Compensation is an inadequate remedy for the harm caused to people's property and livelihoods.	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p> <p>Please see Table 11 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding land use.</p> <p>Please see Table 29 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – house prices.</p>
013	SPR has failed to provide the Landowners with sufficient information, including in particular, likely timings for works to commence and complete, and depths of cables. This represents a failure to consult properly with and work with the owners of land affected by each DCO proposal.	<p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to do so.</p> <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners, occupiers and representatives to continue to communicate likely timings of construction.</p> <p>Chapter 6 Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months. Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>As described in the Chapter 6 Project Description (AP-054) the onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural soil over the cables.</p>
014	This has exacerbated more general failures in the consultation process, with inadequate information being given to affected individuals and communities. Indeed the consultation process has been so flawed that the DCO process should be stopped and SPR made to re-examine its proposals and then consult properly.	<p>The Applicant has undertaken comprehensive consultation as set out in the Consultation Report (APP-029) and of particular reference to this representation, Consultation Report - Appendix 10 - Landowner and Statutory Undertaker Consultation (APP-040).</p> <p>This is a matter that has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 1 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding adequacy of consultation.</p>



2.8 Jonathan Franklin (RR-334)

Table 16 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Jonathan Franklin RR-334	136, 137	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	139	Temporary Occupation and Use	in respect of rights granted by deed dated 19 November 1979
	138, 142	Temporary Occupation and Use	Owner

Table 17 Applicant's Comments on Jonathan Franklin's Relevant Representation

No.	Relevant Representation	Applicant 's Comments
001	I live 500 metres away from where Scottish Power are proposing to install a huge substation for EA1N. I thoroughly support Friston Parish Council's objection to the siting of this substation. It will destroy 30 plus acres of pristine Suffolk. It will; - destroy quality of life, - destroy wildlife for ever, - change the character of not only Friston but that of several other adjacent villages, It will greatly affect to the worse the lives of many people. I am in favour of windfarms but not when they are badly thought out. There is a perfectly good site, to which nobody would object and that is going out of Leiston towards Sizewell, over the level crossing and on the right is a barely used field with several	<p>Section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Connection and Infrastructure Options Note (CION) process and the work undertaken by the Applicant with National Grid to establish a grid connection location. The CION process considers the total life cost of the connection assessing both the capital and projected operational costs to the onshore network (over a project's lifetime) to determine the most economic and efficient design option. This is a principle driver for the location of substations. Table 4.3 provides a summary of the optioneering within this process.</p> <p>The Applicant has followed NPS EN-1, NPS EN-3, NPS EN-5 the Electricity Act 1989 and National Grid's Guidelines on Substation Siting and Design (Horlock Rules) with the following aims:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant 's Comments
	derelict unused farm buildings. Put it there and not in the middle of unspoilt countryside.	<ul style="list-style-type: none"> Onshore substation to be positioned as close to the existing National Grid overhead lines as possible to reduce the requirement for cabling; and Onshore substation and National Grid substation to be positioned to deliver an efficient and economic system. <p>Paragraph 2.6.34 of EN-3 makes it clear that Applicant must work within the regulatory regime for offshore transmission networks established by Ofgem. The Applicant has done this and has gone through the appropriate processes for the siting of the grid connection in line with the regulatory framework.</p> <p>The initial onshore study area encompassed an area within a 1km buffer of the overhead line route into Sizewell. This was to ensure that any potential options, at a less economic and efficient distance from the overhead line, would still be captured and considered. Section 4.9.1.2.4 describes the subsequent review and refinement of this initial study area.</p> <p>Within the onshore study area, seven zones were identified as potential substation sites, based on available space to accommodate the required project (section 4.9.1.3). Additionally, a 'target' buffer of 250m from residential properties was applied as a proxy for minimising disturbance to residents.</p> <p>The seven potential substation zones were scored using a Red / Amber / Green (RAG) assessment (Appendix 4.2 (APP-443)) against criteria agreed with statutory consultees. These included archaeology / heritage, ecology, landscape, hydrology and hydrogeology, engineering, community, landscape and visual, property and planning. The RAG assessment did not identify the chosen onshore substation site, rather it was a tool that allowed a number of sites to be compared and the most acceptable sites identified at the time to progress to further assessment stages.</p> <p>The culmination of the various work streams as described in section 4.9.1.3 enabled the Applicants to decide that the substation zone northeast of Friston (Zone 7) as the proposed zone to be taken forward.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant 's Comments
		<p>Phase 3.5 Consultation (section 4.9.1.6 of Chapter 4 Site Selection and Assessment of Alternatives) enabled the Applicant to engage with local communities and consultees on the opportunity to consider an alternative substation site at Broom Covert, Sizewell (Zone 8) in parallel with proposals for a substation site at Grove Wood, Friston (Zone 7).</p> <p>As set out in section 4.9.1.6., there are significant differences between the proposed onshore substations sites Grove Wood, Friston and Broom Covert, Sizewell:</p> <ul style="list-style-type: none"> • Presence of Broom Covert, Sizewell within the Suffolk Coast and Heaths AONB, contrary to NPS EN-1 and NPPF policy; presenting a significant consenting risk to the project. A suitable alternative outside the Suffolk Coast and Heaths AONB exists (Grove Wood, Friston) and therefore exceptional circumstances do not exist to site within the AONB; • The Broom Covert, Sizewell site is located within the AONB (which is contrary to the NPS EN-1 policy) and siting in the Broom Covert, Sizewell site is likely to result in significant effects on some of the special qualities of the AONB; • Significant risk of Compulsory Acquisition Powers not being available to SPR at the Broom Covert, Sizewell site (due to the proximity to Sizewell B Nuclear Power Station and Galloper Offshore Wind Farm statutory undertaker land and the use of the site as reptile mitigation land for the proposed Sizewell C New Nuclear Power Station development; • The need to secure replacement reptile mitigation land for the Sizewell C New Nuclear Power Station development on a voluntary basis, without the ability to secure land by compulsory acquisition (as land would need to be secured prior to SPR's compulsory acquisition rights being made available to allow its use by EDF); and



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant 's Comments
		<ul style="list-style-type: none"> Additional costs incurred in laying an additional 6km cable length to Grove Wood, Friston. <p>The Broom Covert, Sizewell site presented significant policy challenges toward gaining consent which outweighed the increased cost of further cabling to the Grove Wood, Friston site. It is the Applicant's position, in accordance with policies set out in NPS EN-1 and based on extensive advice and stakeholder engagement that the Grove Wood, Friston site offers the most appropriate option for the siting of onshore substations and National Grid infrastructure (section 4.9.1.7).</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p>



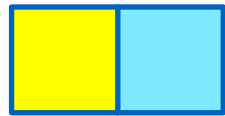
2.9 June Bloomfield (RR-153)

Table 18 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
June Bloomfield RR-153	78, 81	Temporary Occupation and Use	in respect of right to pass water and electricity through water and electricity mains and right of access to maintain fence
	80	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right to pass water and electricity through water and electricity mains and right of access to maintain fence

Table 19 Applicant's Comments on June Bloomfield's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	The impact of 7 known energy projects to be constructed in natural, unspoilt countryside have not been assessed competently environmental and economic disaster	<p>The cumulative impacts of other projects has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.</p>
002	Siting of substation in Friston defective process inappropriate development in scale and use class for a small heritage village existing severe flooding will be exacerbated destruction of open rural landscape and ancient woodland	<p>This is a matter has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
003	Time scale Misled by SPR about time scale originally 2yrs for cable install, now 10yrs for cable install and haul road with some land owners being asked for up to 17yrs rights.	<p>The Applicant does not accept that the Applicant has been misleading about timescales. The Applicant will work constructively with landowners and occupiers and continue to communicate likely timings of construction.</p> <p>Chapter 6 - Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months. Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months. National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The East Anglia TWO project and East Anglia ONE North project are two separate projects which are the subject of two separate Applications.</p> <p>At this stage it is not known whether both projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>In fully assessing the above scenarios within each ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.</p>
004	Cable corridor landing on fragile Thorpeness cliffs sited unacceptably close to residential properties without proper mitigation for noise, air, light pollution.	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 24 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – landfall.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p> <p>Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
005	Haul Road Misled by SPR about future expansion, HOT's now allow for passing on rights to 3rd parties in particular National Grid and have said that they will not sterilise the route way or substation site from future expansion.	In order to successfully deliver these projects, the Applicant does require the ability to assign rights to third parties like an Offshore Transmission Owner (OFTO), National Grid or a sub-contractor, however, any rights sought via the Application are limited to those required for delivery of the Projects only.
006	Compound misled on site, size and noise, dust and light pollution ill-considered 16 acre site in close proximity to place of worship and residential properties understated impact of light pollution and security management unacceptable 7am to 7pm, 6 days per week unlimited access	<p>The Applicant does not accept the comment that the Applicant has been misleading on any of these matters and these matters have also been raised in other Relevant Representations and topic responses have been prepared:</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p> <p>Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 22 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – size of substations.</p>
007	Traffic and road usage Evaluation of the impact on the transport infrastructure poorly assessed with an unacceptable increase in HGV traffic, which ignores obvious pinch points such as exist on the A1094 at Friday Street rail bridge, Snape-Watering Hill, approaching Wadd Lane Snape and the B1069 from Black Heath Corner to Knodishall. These pinch points already cause problems for the passing of the light HGV traffic that currently use these roads. safety issues for all traffic, cars, cyclists and	In relation to this comment on current problems with existing traffic, pre-application technical engagement was undertaken via the Traffic and Transport Expert Topic Group (ETG), described within Chapter 5 EIA Methodology (APP-054). Meetings were held in April 2018, May 2018, July 2018, September 2018, January 2019 and May 2019. The Traffic and Transport ETG stakeholder membership comprised the relevant technical leads from East Suffolk Council (ESC), Suffolk County Council (SCC) and Highways England (HE). The ETG discussed and agreed the methodology for the assessment and the assumptions within it. The ETG agreed that the survey window to establish the baseline traffic counts should

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
	pedestrians, emergency vehicles, flow, management and speed.	<p>be representative of the existing environment. The assessment is based on the percentage of extra traffic over the baseline.</p> <p>Chapter 26 - Traffic and Transport (APP-074) provides an assessment of the traffic and transport effects of the Project. In addition, Appendices 26.1 – 26.26 (APP-527 - APP-552) provide further information on detailed aspects of this assessment.</p> <p>The A1094 from the A12 to Snape is identified as Link 6a; the A1094 through Snape as Link 6b. Link 6b is allocated a High sensitivity. The junction of A1094 and B1069 is assessed for collision data in section 26.5.4.2.4 as Cluster 4.</p> <p>This is a matter has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
008	Environmental effect wildlife habitats will be lost migration corridors for mammals and reptiles cut off migrating birds and endangered species under real threat use of adjacent woodlands proposed to re-site badger sets unresearched removal of hedgerows and trees footpaths and Rights of Way temporarily closed or diverted	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p> <p>Please see Table 23 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding public rights of way.</p>
009	Public consultation Failure to properly consult with affected individuals and communities Neither SPR or the District Council made any attempt to check that the population were aware of the implications of the these and the forthcoming proposals.	<p>The Applicant has undertaken comprehensive consultation undertaken as set out in the Consultation Report (APP-029) and of particular reference to this representation, Consultation Report - Appendix 10 - Landowner and Statutory Undertaker Consultation (APP-040).</p> <p>This is a matter has also been raised in other Relevant Representations and a topic response has been prepared:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Please see Table 1 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding adequacy of consultation.
010	National Grid's major involvement in the scheme with its own sub station and relocation of pylons is not noted anywhere in the DCO and had no involvement in the poorly run consultation process.	<p>National Grid infrastructure forms part of the Application (Chapter 6 Project Description (APP-054)). National Grid is a development partner for the Project and the Applicant has engaged in consultation on behalf of National Grid.</p> <p>The Applicant has also engaged with National Grid Energy Transmission since the Project's inception. Outcomes of this engagement and project developments have been subsequently communicated to the general public as described in the Consultation Report (APP-029).</p> <p>The Applicant does not accept that National Grid is not included in the draft DCO (APP-023), for example descriptions of the National Grid works in the DCO, please refer to the draft DCO (APP-023), Work No 34, Work Nos 38 to 43.</p>
011	<p>This is a major failure of the DCO process and should halt procedure until proper verifiable consultation has been carried out. Blight noise, light and air pollution devaluation of properties</p> <p>This will be repeated along the route and in the village in perpetuity.</p>	<p>These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p> <p>Please see Table 29 in Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – house prices.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.10 Maria Toone (RR-822)

Table 20 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Maria Toone RR-822	23	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of grazing licence

Table 21 Applicant's Comments on Maria Toone's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	I object to this Wind farm and request that this planning application is rejected.	Noted.
002	There should be a ring main around the UK for these wind farms.	<p>The construction of an offshore ring main has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 17 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding offshore ring main.</p>
003	The proposed wind farm does not take into account the full impact of both EA2 & EA1N projects, the proposed Sizewell C Nuclear Power Station, the Sizewell B Nuclear Power Station relocated facilities project and Outages, the Sizewell A Power Station decommissioning work, visitors, increase in residents (new housing projects), business, National Grid Ventures two interconnector projects (Nautilus and Eurolink) etc on this Suffolk Coast and	<p>These matters have also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

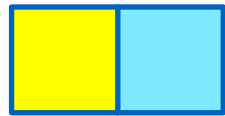
No.	Relevant Representation	Applicant's Comments
	Heaths AONB area which has many special designated areas, wildlife and right of ways.	
004	The Sandlings SPA, which is an important area of habitat for several protected species has declined in the last century, represents 1% of total lowland heath left in the world will be significantly affected by these projects.	<p>This matter has also been raised in other Relevant Representations and a topic response have been prepared:</p> <p>Please see Table 19 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology. Of particular relevance to this comment is the section 'Impacts on the Sandlings SPA / Sandlings heath'.</p>
005	<p>The Tourism industry is currently worth £210,000,000 a year in the AONB which is predominately focused on the coastal fringe. The businesses will suffer in the area as tourists will not want to visit Sizewell beach, stay at the caravan sites, run in the 'Park Run' on a Saturday, join the events that utilise the Sizewell AONB area walks, etc due to the increase in traffic, noise, visual impact, etc caused by these projects.</p> <p>Even the Crown Estate report 'Understanding the impacts of offshore wind farms on wellbeing' 2015 identified that there is a localised loss in tourist numbers and expenditure for these developments.</p>	<p>This matter has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality. Of particular relevance to this comment is section the 'Effects on the Suffolk Coast and Heaths Area of Outstanding natural Beauty (AONB)'.</p>
006	The road (Lovers Lane / Sizewell Gap) intended to be used for access to the Haul Path is the only access road to the Nuclear Power Stations, Sizewell village, Sizewell Beach and access to Leiston for HGVs (which are no longer restricted to 40 mph) / large vehicles. This is a 60mph road (National speed limit) which already has high traffic movements which substantially increase during the summer months, Sizewell B Outages and projects,	The Applicant notes this comment on the existing road usage of Lovers Land and Sizewell Gap. The impacts of the Projects usage of these roads were fully assessed, for information on this assessment, Chapter 26 - Traffic and Transport (APP-074) provides an assessment of the traffic and transport effects of the Project. In addition, Appendices 26.1 – 26.26 (APP-527 - APP-552) provide further information on detailed aspects of this assessment.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>Sizewell A decommissioning projects, Sizewell A & B site shift changeovers, Business deliveries to Leiston and Sizewell Waste Recycling Centre. There are many accidents on this road each year. This increased massively during the construction phases of both Greater Gabbard and Galloper sub stations.</p> <p>The proposed entrances off this road to the suggested Haul Paths compounds are placed on dangerous spots on the Sizewell Gap road. There are safety issues at Household Recycling site:</p> <p>1) parked vehicles in road when site closed for container movements and when no available spaces for unloading,</p> <p>2) site entrance less than 200 m and unsighted of brow of hill for vehicles travelling North towards the B1122.</p> <p>This road (Lovers Lane / Sizewell Gap) requires a reduction to 30mph for the duration of the project and as a permanent solution for the whole length of this road from the B1122 to Sizewell village. There should be vehicle activated speed warning signs to reinforce the reduced speed limit.</p> <p>Further signage warning of turning vehicles in/out of properties, especially at (redacted) We have a 7.5 ton horse lorry (which carries 3 horses) and a couple of very large over sized trailers which we have to manoeuvre in and out of our entrance by crossing both lanes of this road.</p> <p>The projects need to police all routes to ensure compliance with authorised routes to sites and to posted speed limits.</p>	<p>In order to inform the assessment an appropriate baseline was agreed. Meetings were held with an Expert Topic Group (ETG) in April 2018, May 2018, July 2018, September 2018, January 2019 and May 2019. The ETG comprised of relevant technical leads from East Suffolk Council (ESC), Suffolk County Council (SCC) and Highways England (HE). The ETG discussed and agreed the methodology for the assessment and the assumptions within it. The ETG agreed that the survey window to establish the baseline traffic counts should be representative of the existing environment. The assessment is based on the percentage of extra traffic over the baseline. If the baseline uses peak periods, then the percentage increase of traffic due to construction vehicles is relatively smaller than if non-peak times are used as the baseline. This approach would understate the magnitude of effect. The recommendation from the ETG was that baseline traffic counts should therefore not be undertaken during school holidays as these peak periods do not represent the worst case.</p> <p>The Applicant does not accept the comment regarding accesses to the onshore development area from Sizewell Gap Road as these were subject to an assessment in accordance with recognised UK guidelines (GEART) and considered the following impacts:</p> <ul style="list-style-type: none"> • Impact 1 – Pedestrian Amenity (section 26.6.1.8.1.7) <ul style="list-style-type: none"> ○ Noting that there are minimal receptors along the link and that pedestrians and cyclists are accommodated off road (i.e. pavement and cycleway), the link is assessed as a low sensitivity. ○ It is considered that a change in background of HGV flows of 132% could result in a medium magnitude of effect on a low sensitivity link resulting in a minor adverse impact. ○ No mitigation further to that embedded within the design of the proposed projects is considered necessary. • Impact 2 – Severance (section 26.6.1.9)



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> It can be noted from Table 26.10 that total traffic flows along link 12 (with and without the proposed project's traffic) are significantly below 8,000 vehicles per day where the DMRB suggests severance is unlikely to manifest. The magnitude of effect upon these links is therefore assessed as negligible on low to high sensitivity links giving a maximum impact of negligible to minor adverse. Impact 3 – Road Safety (section 26.5.4) <ul style="list-style-type: none"> A review of historic data showed this link to be well below the national average for personal injury collisions and therefore this link was not considered further in line with the agreed methodology. The Outline Access Management Plan (OAMP), Annex 1 (APP-587) details UK standard compliant access treatment for Access 1 and Access 2 which includes the provision of a 40mph speed limit to promote road safety. The design has been validated by an Independent Road safety Audit which is appended to the OAMP. Impact 4 – Driver Delay (capacity) The highway locations sensitive to Driver Delay impacts were identified in consultation with Suffolk County Council and Highways England in the context of the proposed projects' traffic demand as detailed in Chapter 26 - Traffic and Transport, Table 26.25 (APP-074). For Link 12, a forecast increase in total traffic of 10% (for EA1N or EA2) and 12% (EA1N and EA2 cumulative) was presented to highway stakeholders and based on this information, the potential impacts were forecast to be insignificant and it was agreed that no further assessment was necessary. Impact 5 – Driver Delay (highway geometry) <ul style="list-style-type: none"> Link 12 is an established haul route for Sizewell B so there are no significant highway geometry Driver Delay impacts.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>In addition to the traffic impacts of the proposed projects', the Applicant has engaged with EDF Energy to consider the cumulative traffic impacts with the proposed Sizewell C Project. EDF Energy has indicated that it does not propose to route construction traffic via Link 12 and therefore there would be no potential for cumulative impacts with Sizewell C.</p> <p>In relation to road safety, this is a matter that was given careful consideration as part of the assessment has also been raised by a number of individual representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 31 in Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
007	The Sizewell area cannot accommodate the proposed haul road with an approx 60 metre plus working width. The proposed area consists of SSSI, conservation area, common land, stewardship land, agricultural land, grazing land and many different rights of ways which will be decimated by this haul road.	<p>It should be noted that the haul road is temporary and would be up to 4.5m wide with passing places of an additional 4m in width at approximately 90m intervals.</p> <p>In relation to this representation and the Sizewell area, the haul road is split into sections at the SPA, as HGVs will be not traversing the SPA to other parts of the onshore cable route.</p> <p>As described in Chapter 6 Project Description (APP-054), it should be noted that if an open-cut methodology is used when the cable route crosses the Sandlings SPA then these works will last an estimated one month in duration. A temporary haul road would be laid for the duration of the open-cut methodology crossing and would be removed once cable installation is complete to enable reinstatement activities to commence as soon as possible. The Applicant has further committed to conducting this estimated one month of open-cut trenching through the SPA, or within 200m of the SPA/SSSI boundary associated with the crossing, outside of the breeding bird season, therefore minimising potential impacts to the features of the Sandlings SPA and Leiston- Aldeburgh SSSI. This will be confirmed post-consent through the production of the Ecological Management Plan.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		The use of a trenchless technique is an alternative methodology to the typical open cut trenching technique of the onshore cable route. This alternative methodology is only for consideration at the location where the onshore cable route crosses SPA and there would be no requirement for a haul road. However, it should be noted that an open-cut crossing technique is the preferred crossing methodology.
008	No right of way (Byway, Bridleway, Footpath, Permissive path) shall be closed off. This whole area and rights of way are used daily 365 days of the year by many individuals, groups, farmers, etc for, but not limited to: walking, running, cycling, horse riding, orienteering by large numbers of individuals and group, etc and it will be detrimental to the area, tourism, well being of residents and businesses if any such areas and rights of way are closed. Diversions must be in place if for any reason a right of way has to be closed for safety reasons. Horse riders are considered vulnerable road users, therefore it is essential for health and safety reasons that all tracks (no existing tracks are to be upgraded to allow construction traffic use), rights of way, permissive paths, bridleways, etc are properly managed during these projects to ensure traffic and construction work does not endanger horses and riders.	<p>The Project will interact with a number of Public Rights of Way (PRoW) within the onshore development area during its construction and operation. PRoW include public roads and pavements, footpaths, bridleways and byways which are formally designated as PRoW by Suffolk County Council.</p> <p>The Outline Public Rights of Way Strategy (APP-581) outlines the management principles to be adopted in ensuring that PRoW are managed in a safe and appropriate manner during construction and operation. Timings of closures and diversions are discussed in section 23.3 and 3.3 of the Outline Public Rights of Way Strategy (APP-581).</p> <p>Precise details for the management of each PRoW, including the specification of any PRoW temporary diversions required during construction works, will be agreed with the Local Planning Authority (following consultation with the Local Highway Authority) through approval of the final PRoW Strategy prior to commencement of any stage of the authorised development that would affect a PRoW specified in Schedule 3 or 4 of the draft DCO (APP-023).</p> <p>Timings of closures and diversions are discussed in section 3.3 of the Outline Public Rights of Way Strategy (APP-581).</p> <p>Potential temporary diversion routes and closures have been proposed, and the PRoW to be temporarily stopped up / diverted are shown in the Temporary Stopping up of Public Rights of Way Plan (APP-013). Table 2.1 in the Outline Public Rights of Way Strategy (APP-581) details the proposed management measures for PRoW requiring temporary control measures during construction. Temporary management measures may include:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • Appropriately fenced (unmanned) crossing points; • Manned crossing points; and • Temporary diversions. <p>Precise details for the management of each PRoW, including the specification of any PRoW temporary diversions during construction works, will be agreed with the Local Planning Authority (following consultation with the Local Highway Authority) through approval of the final PRoW Strategy, prior to commencement of any stage of the authorised development that would affect a PRoW specified in Schedule 3 of the draft DCO (APP-023).</p> <p>Article 11 of the draft DCO requires the alternative right of way to be in place to the reasonable satisfaction of the Local Highway Authority before the existing PRoW can be temporarily stopped up.</p> <p>Relevant County, District and Parish Councils would be notified approximately 4 – 6 weeks in advance of any temporary closure.</p> <p>Temporary diversions will involve a short diversion around construction works, allowing construction works to progress in the area of the original PRoW. Once these construction works (or a phase of construction works) are complete, the PRoW would be reinstated along its original route. Depending on the nature and timing of the construction works this temporary diversion arrangement may be implemented a number of times during construction.</p> <p>As public rights of ways have also been raised by a number of individual Relevant Representations, the Applicant has prepared a topic response on the matter where further context to this Relevant Representation is also provided:</p> <p>Please see Table 23 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding public rights of way.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
009	<p>There is terrible coastal erosion to the south of the Sizewell gap road. Last year this coastal erosion between Sizewell and Thorpeness took the life of one person and the gardens of a number of houses in Thorpeness.</p> <p>The proposed landfall site area which could be up to 8 acres in size and the horizontal directional drilling required will erode this coast line further and endanger housing, land and the people who use the beach and rights of way. An alternative connection needs to be made in a different location other than Thorpeness and the Sizewell area</p>	<p>This matter that was given careful consideration at the site selection stage and has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 24 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – landfall.</p>
010	<p>We have endured horrendous noise, vibration, air pollution, increased traffic, increased traffic accidents, light pollution, abuse, construction work 24 hours, weekend construction work 12 hours a day (note: 24 hours and 7 days a week 12 hours a day working done continuously due to project deadlines / behind schedule), etc from the construction of the Greater Gabbard, Galloper and National Grid substations and the new National Grid connection to the overhead lines.</p>	<p>The Applicant notes this comment on other projects. The Applicant has given careful consideration to the construction effects and this has been assessed and mitigated through project design, for further information on this and mitigation plans please see the Applicant's responses:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p> <p>Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements. Of particular relevance to this comment is section the Lighting during Construction</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
011	<p>We are still currently enduring elevated noise levels to the point of being unbearable from these operational compounds today as well as the Turbine noise from Sizewell B following the building of the Dry Fuel Store, the fallen and removed trees along the SSSI (entrance road to Nuclear sites), Coronation wood and Sizewell Went woods. Due to further removal of trees from the Sizewell Went wood for the Galloper substations compound and National Grid connection to the overhead lines there is more light pollution from the Greater Gabbard substations compound.</p> <p>There is also more light pollution from both Sizewell A and B sites following the fallen and removed trees along the SSSI, Coronation wood and Sizewell Went woods</p>	<p>The Applicant notes this comment on other projects and it should be noted that these Projects will have differing effects. As this land relates to the onshore cable, once the cables are installed underground, any lighting effects will be temporary during construction and emergency maintenance. The Applicant has given careful consideration to the construction effects which have been assessed and mitigated through the project design process. These matters have also been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p> <p>Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements.</p>
012	<p>For the well being of myself and nearby residents we cannot endure any further disruption, noise, light pollution, traffic, abnormal working hours, house price depreciation, etc from these proposed projects.</p>	<p>The impact of the Project on house prices is not a material consideration and there are many reasons why house prices vary. National Policy Statements do however offer specific policy support for the assessment of effects that a project may have on residential receptors. The Environmental Statement has provided appropriate impact assessment on residential receptors in line with the overarching National Policy Statements in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5). The potential impact on residential receptors has been considered throughout the development of the Project and this is reflected in the site selection process reported in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). In addition, the potential effects on residential receptors and residents has been further considered and evaluated in other topic specific chapters, including Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 74</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

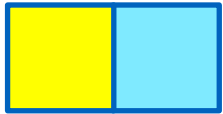
No.	Relevant Representation	Applicant's Comments
		Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).
013	There needs to be a reduced number of working hours (8am to 5pm) and days (Monday to Friday) on these projects and strict controls to ensure compliance within these working parameters e.g. staff not to be allowed to enter working areas or start work until the designated time. No extensions to be authorised at all especially due to the projects being behind schedule.	<p>Construction activities would normally be conducted during Monday to Friday working hours of 7am to 7pm and Saturday working hours of 7am to 1pm. Working hours are not proposed for Sundays or Bank Holidays. These working hours have been reduced on Saturdays from those originally proposed following feedback received from Section 42 consultation. Exceptions to these working hours for the works are described in section 6.9 Onshore Programme of Chapter 6 Project Description (APP-054), for the onshore substation these include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the ES, such as concrete pouring, dewatering, cable pulling, cable jointing and HDD; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>For the National Grid infrastructure, these exemptions include:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; • Fitting out works associated with the National Grid substation;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> The completion of construction activities commenced during the approved working hours which cannot safely be stopped; The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>Working hours are secured through Requirement 23 and Requirement 24 of the draft DCO (APP-023) and will be signposted within the final Code of Construction Practice prepared post-consent to discharge Requirement 22 of the draft DCO (APP-023). The final Code of Construction Practice must accord with the Outline Code of Construction Practice submitted with the DCO application (APP-578), which provides detail on working hours within section 3.1.</p>
014	<p>There is going to be detrimental effects on the environment, people's health and habitat from the increased transmission of electricity on the overhead pylons (EMF - Electromagnetic Field). I have noticed a huge difference to the weight on the transmission lines (lowering affect), noise levels from the pylon and transmission lines since the Galloper Wind farm became operational. These overhead lines cannot take the electricity generated by all these developments without increasing the risk to the environment, people's health, habitat and interference with other electrical devices nearby (residential properties).</p> <p>National Grid needs to install new connections elsewhere across the country to stop one area being overwhelmed by energy installations, becoming a security risk (too many energy installations on one National Grid line in a single area), increasing the risk of EMF and noise levels.</p>	<p>It should be noted that from the landfall, cables will be routed underground to an onshore substation and in the area associated with this representation, there is no increase in transmission on the overhead lines. However, human health has also been raised by a number of individual Relevant Representations, the Applicant has prepared a topic response on the matter where further context to this is also provided:</p> <p>Please see Table 10 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding human health.</p> <p>Furthermore, cumulative impacts of other projects and the grid connection point have been raised by a number of individual Relevant Representations, the Applicant has prepared a topic response on these matters:</p> <p>Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Please see Table 9 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding grid connection point.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.11 Martin Cotter (RR-237)

Table 22 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Martin Cotter RR-237	106, 108, 110	Freehold Purchase	in respect of right of way
	133, 135	Freehold Purchase	in respect of right of way over access track and to install and maintain water pipe beneath access track
	132	Temporary Occupation and Use	Owner

Table 23 Applicant's Comments on Martin Cotter's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	My property is a listed building and sighted a few hundred metres north of the proposed infrastructure locations. This area of Suffolk is still one of the few unspoilt idylls left in our industrialised lands and whilst I have a vested interest in objecting to the sighting of the proposed infrastructure I also feel that this definitely is not the right location for 35 acres of concrete and steel. It seems to me pure madness to wantonly destroy miles of countryside with needless cable corridors and substation sightings when there are perfectly sound and environmentally friendly ways to achieve the climate reduction goals our government has signed up to. The development of an offshore ring main with landfall and substations at brown field sites is a perfectly plausible	<p>The Applicant notes the comments made and these matters have also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared topic responses on the matters:</p> <p>Please see Table 17 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding offshore ring main.</p> <p>Please see Table 22 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – size of substations.</p> <p>Please see Table 24 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – landfall.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	solution enabling the required goals to be achieved without the destruction of our heritage assets. Be mindful as the examining body that this is just the first of many applications for grid connection that will come once the rest of the North Sea becomes available to the highest bidder. How many more substations are we going to allow before we realise that what we have destroyed is not retrievable.	Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.
002	This is not the correct location for industrial infrastructure on this scale.	The onshore substation site selection process has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter. Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.
003	Historically Friston has had flooding issues many times. This will only exasperate the situation.	The historic flooding issues has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter. Please see Table 32 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding water resources and flood risk.
004	Coastal locations and brownfield sites should be considered in the first instance. National grid should be made to supply the infrastructure so Wind farms can get grid connection at coastal land fall.	The point at which the Projects connects into the National Grid and the location of associated substation infrastructure has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on these matters Please see Table 9 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding grid connection point.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.
005	This project will cause unlimited environmental harm	The impact of the Projects has been assessed and the findings of this assessment have been provided in the Environmental Statement (APP-049) to (APP-575)



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

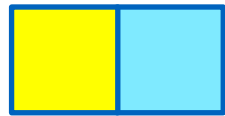
2.12 Martin Handscombe (RR-394)

Table 24 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Martin Handscombe RR-394	128	Freehold Purchase	Owner
	122, 122A	Temporary Occupation and Use	as assumed owner
	117, 117A	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	120, 121	Temporary Occupation and Use	Owner

Table 25 Applicant's Comments on Martin Handscombe's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>I support the representation being made by SASES and Friston Parish Council and believe the proposed site will cause irreparable damage to the character of Friston , Suffolk Coast and Heaths AONB and Tourism because of the following:</p> <ul style="list-style-type: none"> • Landscape and visual effects • Noise/light pollution/damage to air quality • Design issues and Masterplan . • Seascape and visual effects . 	<p>The points raised in the Relevant Representation by SASES have been considered and are addressed in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1). The points raised in the Relevant Representation by Friston Parish Council have also been considered and are addressed in in <i>Table 9</i> in <i>Applicant's Comments on Relevant Representations Volume 3</i> (document reference ExA.RR3.D0.V1).</p> <p>In response to the specific matters referred to in the relevant representation, the Applicant would refer to the following documents:</p> <ul style="list-style-type: none"> • Landscape and visual effects <p>Please see <i>Table 13</i> in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<ul style="list-style-type: none"> Cumulative impacts/residual impacts of the project . *Loss of equity and financial implications . Socioeconomic impacts/Tourism/no jobs from onshore development . Effect on Public Rights of Way . Flood risk . Ecology/coastal change . Archaeology/historic buildings/ancient woodlands. Construction Management . 	<p>the Applicant's comments on Relevant Representations regarding landscape – substations.</p> <ul style="list-style-type: none"> Noise/light pollution/damage to air quality <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p> <ul style="list-style-type: none"> Design issues and Masterplan <p>Please see Table 13 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.</p> <ul style="list-style-type: none"> Seascape and visual effects <p>Please see Table 27 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding seascape.</p> <ul style="list-style-type: none"> Cumulative impacts/residual impacts of the project <p>Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • *Loss of equity and financial implications Please see Table 29 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – house prices. • Socioeconomic impacts/Tourism/no jobs from onshore development Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality Please see Table 28 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – employment and skills. • Effect on Public Rights of Way Please see Table 23 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding public rights of way. • Flood risk Please see Table 32 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding water resources and flood risk. • Ecology/coastal change Please see Table 24 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>the Applicant's comments on Relevant Representations regarding site selection – landfall.</p> <ul style="list-style-type: none"> Archaeology/historic buildings/ancient woodlands <p>Please see Table 4 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cultural heritage.</p> <p>Please see Table 33 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding woodland.</p> <ul style="list-style-type: none"> Construction Management <p>Please see Table 21 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – construction strategy.</p>
002	<p>Furthermore I feel the proposed Permanent Access Road will be unnecessarily near my home and compromise its drainage and also unnecessarily wide given it will only be used for LGV and maintenance access except for the Abnormal Indivisible Loads (will it be illuminated and outside of emergency what hours will it be used ?) .</p>	<p>Chapter 6 Project Description (APP-054) states that the substation operational access road will be used for all operational vehicle access, including Abnormal Indivisible Load access (during construction and operation), and potentially (once available) for construction personnel movements. HGVs will not use the substation operational access road during construction.</p> <p>Paragraph 460 of Chapter 6 Project Description (APP-054) states that the permanent operational access road would be up to 8m in width (emphasis added). Detailed design of the permanent operational access road routeing will be undertaken as part of the detail design process post consent based on a range of factors including ground conditions, final transformer transportation vehicle specification and turning radius.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		The Order limits provide flexibility to microsite the route of the operational road and due regard will be given to the respondent's residential property and the curtilage thereof. The route of the operational road shall be determined through a detailed design process.
003	Also the road widening of Saxmundham Road should only be undertaken to the extent this is necessary for the AILs and reinstated `	There is no proposed road widening of Saxmundham Road. However, there are potential temporary works in relation to vegetation clearance which may be required to enable delivery of Abnormal Indivisible Loads (AILs) to the substations via the operational access road. This would be subject to further investigation nearer the time of delivery to confirm what, if any vegetation would be required clearing dependent on number of variable elements, for example size of AIL, type of vehicle transporting the AIL and vegetation growth.
004	SPR must take steps to prevent the Saxmundam Road being used for Works Traffic including construction workers going to site - they should use the A1094 and Haul Road .	<p>As part of the Outline Construction Traffic Management Plan (OCTMP) (APP-586) the Applicant has looked to address issues surrounding the use of local roads during construction. The proposals contained within the OCTMP shall be confirmed through the formal approval of the final Construction Traffic Management Plan.</p> <p>The strategy for access applies a hierarchical approach (informed by the SCC HGV route hierarchy) to selecting routes and where possible, seeks to reduce the impact of HGV traffic upon the most sensitive communities. The access strategy includes the following commitments:</p> <ul style="list-style-type: none"> • All HGV construction traffic would be required to travel via the A1094 or B1122 from the A12, no HGV traffic would be permitted to travel via alternative routes, such as the B1121 or B1119. • No HGV construction traffic would be permitted to travel via the B1121 through Friston, Sternfield or Benhall-Green.



2.13 Michael Mahony (RR-538)

Table 26 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Michael Mahony RR-538	114	Freehold Purchase	as assumed owner
	128	Freehold Purchase	in respect of right of way over access track
	126	Temporary Occupation and Use	as assumed owner
	117, 117A	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	116	Temporary Occupation and Use	Owner
	115	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner

Table 27 Applicant's Comments on Michael Mahony's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	I am the freehold owner and occupier of the residential and agricultural land comprised in Plots 115, 116 and 126 on the Land Plans, over which permanent and temporary rights are sought under the proposed Development Consent Orders ("DCO"). In addition it needs to be verified that no part of my land is included in Plots 117 and 117A. If it is, then the representations below in respect of Plot 126 apply equally in respect of that land.	As detailed in the Statement of Reasons (APP-026) the Applicant lists out the Plots and rationale behind rights being acquired for each Plot the respondent refers to: Plot 114 – Land will be used for the new operational access to the substations. Plot 115 - Permanent rights are sought for the construction, operation and maintenance of new overhead lines.



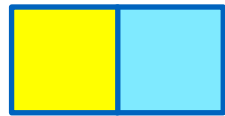
Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Plot 116 - The land will be used for the construction, operation and maintenance of temporary overhead lines. The land will also be used temporarily for areas for works associated with National Grid infrastructure. Plot 117 is located on the adopted highway and the land will be used temporarily for areas for works associated with National Grid infrastructure.</p> <p>Plot 117A – The land would be used for the assembly and erection of temporary netted scaffold protection which will be required over the B1121 crossing during stringing works as well as any vegetation clearance required to facilitate such works.</p> <p>Plot 126 is located on the unregistered highway verge and temporary rights are sought to clear vegetation to increase the visibility swathes on the approach to the new operational access to the substations.</p> <p>Plot 128 - Land will be used for the new operational access to the substations.</p> <p>In respect of the Plots 114, 117, 117A and 126, the rule of 'ad medium filum' has been applied in respect of a boundary presumption that an owner of land which abuts either a public or private road (to the extent not otherwise recorded within separate ownership) also owns the subsoil of the road, up to the mid or centre point.</p>
002	<p>I am also part of a wider group of local residents (SASES) who object in principle to the placement of the grid connection for projects EA1N and EA2 (including three substations, cable sealing end compounds, an additional pylon and associated infrastructure) next to the village of Friston. This group has made its own relevant representations along with Friston Parish Council. I adopt these in full.</p>	<p>The points raised in the SASES Relevant Representation have been considered and are addressed in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) The points raised in the Friston Parish Council Relevant Representation have also been considered and are addressed in <i>Table 9 of Applicant's Comments on Relevant Representations Volume 3</i> (document reference ExA.RR3.D0.V1).</p>



No.	Relevant Representation	Applicant's Comments
003	<p>Permanent Access Road Excessively Wide - Those representations refer to the 1700m long and 8m wide permanent access road. This road will be constructed close to the western and northern boundaries of my land. My understanding is that, aside from the delivery of four Abnormal Indivisible Loads, this road will not be used during construction and its use should be so restricted in the DCO. Further once operational the substation complex is unmanned and the road is only required for occasional maintenance and inspection using LGVs and accordingly its use should be so restricted. No justification (not least given the landscape damage and loss of agricultural land) is provided as to why this road needs to have a permanent width of 8 metres or why the Saxmundham Road (which is adjacent to the southern boundary of my land and from which it is accessed) needs to be permanently modified.</p>	<p>Paragraph 460 of Chapter 6 – Project Description (APP-054) states that the permanent operational access road would be up to 8m in width (emphasis added). Detailed design of the permanent operational access road routing will be undertaken as part of the detailed design process post consent based on a range of factors including ground conditions, final transformer transportation vehicle specification and turning radius. The final road width will be determined as part of this process in collaboration with National Grid.</p> <p>Chapter 6 – Project Description (APP-054) states that the substation operational access road will be used for all operational vehicle access, including Abnormal Indivisible Load access (during construction and operation), and potentially (once available) for construction personnel movements. HGVs will not use the substation operational access road during construction.</p> <p>It is noted that a buffer has been left between the permanent operational access road and the landowner's residential property, and Work No. 33 includes not only the permanent operational access road but also landscaping works including bunding and planting.</p> <p>The Applicant confirms there is no permanent modifications to Saxmundham Road, apart from the creation of a bell mouth for the operational access is located on private land not owned by this landowner.</p>
004	<p>DCO Provides Excessive Flexibility – Those representations also refer to excessive flexibility in the DCO to determine the form of the development. This relates not just to the construction and design of the projects and their execution, but also matters such as, for example, timing. The development can commence at any time up to seven years after the DCO comes into force. Assuming that is 2021 and calculating the estimated construction and reinstatement periods for the projects on</p>	<p>The East Anglia TWO offshore windfarm project and East Anglia ONE North offshore windfarm project are two separate projects which are the subject of two separate DCO applications. The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>At this stage it is not known whether both projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each Environmental Statement include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	a consecutive basis, the applicant/the National Grid/their contractors may not be off site until 2035.	<ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>Scenario 1 assumes that the landfall, onshore cable corridor and onshore substation construction periods for the two projects occur over the same period as would have occurred for a single project (the anticipated programme is presented in Chapter 6, Section 6.9 of the ES (APP-054) and is summarised above.</p> <p>Scenario 2 assumes onshore construction of the first project and its full re-instatement, followed by the construction of the second project at a later date.</p> <p>The construction duration of each project is as illustrated above. These cumulative assessment scenarios also ensure that a partial overlap in project construction has been fully assessed within the ES.</p> <p>In fully assessing the above scenarios within each ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.</p> <p>In scenario 2, plots 115 and 116 will be subject to only minor works involving earthing to facilitate the connection of the second project.</p> <p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains the use of a project design envelope approach, also known as a 'Rochdale Envelope'. This approach is recognised by the Planning Inspectorate in their Advice Note Nine: Rochdale Envelope.</p> <p>The Rochdale Envelope comprises the maximum footprint and heights of the onshore substation and National Grid substation and ensures that the environmental impact assessment is based on the reasonable worst-case project design.</p>

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
		<p>The maximum footprint and heights are necessary to ensure that the Applicant has sufficient space within the consented project parameters to safely and efficiently design, construct and operate the onshore substation and National Grid substation. The maximum footprint required is based on the Applicant's experience of similar projects and reflects the installed capacity of the project and where possible the Applicant has refined the Rochdale Envelope through design iterations.</p>
005	<p>Without prejudice to those representations, I also object to the nature and extent of the rights being sought over my land. These are identical for each project and, as a result, so are my objections. The rights relate to the applicant's plan (or rather the National Grid's plan in the case of (a)) to: a. replace and relocate an electricity tower in the north eastern corner of Plot 115 and redirect the associated conductor to meet the cable sealing end compound; and b. to carry out modifications and traffic management measures to the B1121.</p> <p>The bases for my objection are that: the rights being sought are more than are reasonably required for the purpose of the development; there is no compelling case in the public interest for the rights to be acquired compulsorily; and such acquisition would amount to a violation of my rights under Article 1, Protocol 1 and Article 8 of the European Convention on Human Rights ("ECHR"). This is so, in general in respect of (a) the scope of the rights being sought; (b) the area of land subject to the rights; and (c) the duration of the rights.</p>	<p>As detailed in the Statement of Reasons (APP-026), the European Convention on Human Rights ("the Convention") was incorporated into domestic law by the Human Rights Act 1998. The Convention contains Articles aimed to protect the rights of the individual (referred to as Convention Rights).</p> <p>The decision maker, as a public body, is under a duty to consider whether the exercise of its powers engages Convention Rights. The approach to be taken to give effect to rights under the Convention is reflected in the advice in the Compulsory Acquisition Guidance.</p> <p>The Order has the potential to infringe the human rights of persons who hold interests in the Order Land. Such infringement can be authorised by law provided the appropriate statutory procedures for making the Order are followed and there is made out a compelling case in the public interest for the compulsory acquisition and the interference with the Convention Right is proportionate. On the basis of decisions of the courts, the test of proportionality is satisfied if the Order strikes a fair balance between the public benefit sought and the interference with the rights in question.</p> <p>The Applicant has weighed the potential infringement of Convention Rights in consequence of the inclusion of compulsory powers within the Order with the potential public benefits if the Order is made.</p> <p>The Applicant considers that there would be significant public benefit arising from the grant of development consent resulting from the generation of renewable electricity. That benefit is only likely to be realised if the Order includes powers of</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>compulsory acquisition. The significant public benefits on balance outweigh the effects upon persons who own property and rights within the Order Land.</p> <p>As presented in Statement of Reasons (APP-026), it is necessary for the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily.</p> <p>Over-arching policy drivers and need for the project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p> <p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> • Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018²⁸) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify. • In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017²⁹), which sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increase offshore wind capacity to 30GW by 2030,</p>

²⁸ Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1.pdf [Accessed 21/05/2019].

²⁹ Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2020].



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>which represents an increase from the approximately 8GW currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030</p> <p>The Project will have a generating capacity estimated at 800 Mega Watts (MW³⁰) and has the potential to make a substantial contribution to UK 2030 energy targets by meeting approximately 2³¹% of the UK offshore wind cumulative deployment target for 2030.</p> <p>Moreover, the Project would have a direct positive impact by securing renewable energy supply for the equivalent of approximately 710,000³² UK households. The Project would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Project³³.</p> <p>Furthermore, a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one, only if the Secretary of State is satisfied that:</p> <ul style="list-style-type: none"> • The land is required for the development to which the development consent relates; • The land is required to facilitate or is incidental to that development; or

³⁰ As measured at point of connection of the onshore cables to the onshore substation

³¹ Based on 800MW / 40,000MW x 100

³² Calculated taking the number of megawatts (800) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 710,945 homes

³³ Page 27 of UK Government Offshore Wind Sector Deal https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The landowner's land is required for the development to which the consent relates as it is required to for the National Grid Overhead Line Realignment Works as detailed below:</p> <p>The new National Grid substation and associated National Grid overhead line realignment works (together referred to as the National Grid infrastructure) are required to connect the project's onshore substation to the national electricity grid. The existing overhead lines to be realigned comprise of four 400kV circuits serving the Sizewell B nuclear power station, two of which are supported by a northern pylon line and two on a southern pylon line, each running parallel to each other.</p> <p>The National Grid substation will connect into each of the four circuits on the National Grid 400kV overhead lines. To facilitate these connections, modifications to the existing overhead lines will be required which will include the permanent realignment of a short section of the northern overhead line further north. This permanent realignment will create the necessary separation distance between the two overhead lines to enable the construction of new cable sealing end compounds to facilitate connection of the two inner circuits into the new National Grid substation. The relocation / reconstruction of up to one pylon on the southern overhead line is also required in order to facilitate the connection into the southern overhead line.</p> <p>Up to three existing pylons will be reconstructed and/or relocated and up to one additional pylon will be required to facilitate the works. This is necessary as the existing pylons in the immediate area of the National Grid substation are suspension type pylons which are not designed to accommodate changes in direction of the overhead line circuits.</p> <p>In terms of the rights required over plot 115 these are permanent rights for the purposes of replacing the existing pylon (Ref.4ZX021) which is proposed to be positioned locally to the existing pylon and within the same general alignment of</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>the existing overhead line route, similarly, permanent rights will be required for any realigned conductors.</p> <p>The temporary rights sought are required to facilitate the following works. The rights are proportionate and necessary. In relation on plot 116, all construction works and any associated oversail relating to these pylons and the temporary masts or pylons require to accommodate temporary diversions of the overhead lines will require temporary rights.</p> <p>Plot 117A – The land would be used for the assembly and erection of temporary netted scaffold protection which will be required over the B1121 crossing during stringing works as well as any vegetation clearance required to facilitate such works.</p> <p>Plot 126 is located on the unregistered highway verge and temporary rights are sought to clear vegetation to increase the visibility swathes on the approach to the new operational access</p> <p>Plot 117 is located on the adopted highway and the land will be used temporarily for areas for works associated with National Grid infrastructure.</p>
006	<p>I make the following submissions in particular (although they do not represent the totality of my objection). Works Nos 39, 40 and 43</p> <p>Plot 116, over which rights of temporary possession (specified in sch. 9 of the draft DCO) are sought, includes part of the residential curtilage to my home (the land to the west of the straight hedge shown on the land plan). There are no towers or conductors traversing this part of my land;</p>	<p>This land is required for the temporary diversion of the circuits on the northern pylon line to allow the existing pylon within land plot 115 to be replaced, with a replacement pylon positioned locally to the existing pylon and within the same general alignment of the existing overhead line route.</p> <p>A temporary diversion is required for the works and this would be built offline to the north west of the existing northern pylon line.</p> <p>Temporary pylon/overhead line construction typically follows a standard sequence of events:</p> <ul style="list-style-type: none"> • Complete pre-construction surveys; • Establish temporary accesses (including any necessary vegetation management)



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • Install temporary mast or pylon foundations; • Assemble and erect temporary masts or pylons; • Erect temporary scaffolds and protection to B1121 (Saxmundham Road) if necessary • Transfer conductors from existing pylons onto temporary mast or pylon; • Transfer conductors back to the modified northern pylon route; • Dismantle and remove temporary masts or pylons; • Re-instate temporary mast or pylon sites and remove temporary access tracks; and • Dismantle and remove temporary scaffolds and protection. <p>Oversail of the temporary overhead line over the residential curtilage may be required depending on the detailed design. If any temporary works are located on the land or oversail it then temporary rights will be required.</p>
007	<p>b. The applicant's agent (Dalcour McLaren) has confirmed to me in writing that:</p> <p>i. there will be no re-routing of the power lines that currently cross my land to the south west of towers ZX22 & ZW22;</p>	<p>There will be no permanent re-routing of the overhead line south west of 4ZX022 and 4ZW022.</p> <p>The temporary diversion of the circuits on the northern pylon line will be undertaken by connecting the temporary spans to existing pylons 4ZX022. The final arrangement for the temporary works will be fully determined following detailed design of the diversion.</p>
008	<p>ii. no access to my land will be required from Saxmundham Road (B1121) to the south;</p>	<p>No additional permanent rights of access are sought to the respondent's property via Saxmundham Road. Access would otherwise be obtained via neighbouring plots to the east as detailed in the Application.</p>
009	<p>iii. neither the applicant nor the National Grid (nor their contractors) will need to need to store plant, machinery or any materials on my land.</p>	<p>No temporary Construction Consolidation Sites will be located on the landowner's land.</p> <p>A temporary working area is required to serve the construction of the National Grid overhead line realignment works. This temporary working area will accommodate</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>spoil storage and material/equipment laydown and storage areas. The temporary working area will be located within Work No. 43 which extends into plots 115 and 116. However, the precise location of the National Grid overhead line temporary working area will be selected with due consideration to avoid existing watercourses, hedgerows and other known infrastructure / constraints where practicable.</p>
010	<p>Despite this, Plot 116 includes a significant amount of land to the south west of tower ZX22 & ZW22, including land close to and within my residential curtilage. This neither necessary nor proportionate</p>	<p>There will be no permanent re-routing of the overhead line south west of 4ZX022 and 4ZW022. As mentioned above, the temporary diversion of the circuits on the northern pylon line is likely to be undertaken by connecting the temporary spans to existing pylons 4ZX022 and this may involve works potentially to be undertaken at 4ZX023 and 4ZX024 to secure the pylons and the circuits attached to the pylons (as these pylons would experience different forces to that for which they were designed).</p>
011	<p>Neither National Grid nor the applicant appear to be able to state how long the temporary rights over Plots 115 or 116 will be required for or when (other than between 2023 and 2027) they will be conducted. Such uncertainty amounts to a disproportionate interference with my use and enjoyment of the land;</p>	<p>Chapter 6 – Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>The East Anglia TWO offshore windfarm project and East Anglia ONE North offshore windfarm project are two separate projects which are the subject of two separate DCO applications. The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>At this stage it is not known whether both projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>Scenario 1 assumes that the landfall, onshore cable corridor and onshore substation construction periods for the two projects occur over the same period as would have occurred for a single project (the anticipated programme is presented in Chapter 6, Section 6.9 of the ES (APP-054) and is summarised above.</p> <p>Scenario 2 assumes onshore construction of the first project and its full re-instatement, followed by the construction of the second project at a later date. The construction duration of each project is as illustrated above. These cumulative assessment scenarios also ensure that a partial overlap in project construction has been fully assessed within the ES.</p> <p>In fully assessing the above scenarios within each ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.</p>
012	<p>The permanent rights sought over Plot 115 (set out at sch.7 to the Draft DCOs) are more than are reasonably necessary or proportionate, and no adequate justification has been provided for them. For example, no justification has been provided for:</p> <p>i. the right to construct and install drains. There appears to be no reasonable basis for requiring drains to be constructed or installed on such a small piece of land, which has had conductors and towers traversing it for a number of years</p>	<p>The final position of replacement pylon 4ZX021 will be determined during detailed design. The rights to construct drainage allows any existing drainage that may be encountered within the working area to be diverted and allows any issues to be rectified should they be discovered during the works.</p> <p>The rights sought are, therefore permanent rights to construct a new pylon and change the conductor alignment on the property, giving full rights of entry onto the property at all reasonable times with or without vehicles, plant and equipment to retain, use, maintain, repair, renew, inspect and remove either of the electric lines. In the process of constructing a new pylon, this may interfere with existing or require new drainage to be installed, however further investigation and design will determine if this is required.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Rights in respect of the existing pylons and conductors exist under the Deed of Grant dated 16th August 2002 (between Charles Grenville Vernon Wentworth and The National Grid Company plc). This Deed provides rights for the existing pylons and conductors on the property but does not permit pylon relocation or conductor realignment.
013	ii. the right to install temporary welfare facilities – especially since (a) Dalcour McLaren has already confirmed that there will be no requirement to store materials on my land; and (b) Plot 116 is small and just a few metres from Plot 113, which is a large plot that the applicant already proposes to acquire as a construction site. This would be more than adequate for the provision of temporary welfare facilities.	The overhead line diversion will require works to be undertaken at multiple locations including at the existing pylon and temporary pylons or masts. Due to the work areas being dispersed, plus duration and nature of the required construction activities, remote site establishment areas away from the main site establishment compound will be required local to the point of work as described above. These are required to provide welfare arrangements for the construction team and facilitate the construction activities being undertaken.
014	Further, no detail has been given in relation to the design of the replacement tower. If the DCO is granted, it should include a requirement that the design to be independently approved before it can be constructed so as to ensure that it will not adversely impact on my visual amenity, the wider landscape and the proximate heritage assets. Work No. 34	The new pylon 4ZX021 will be an angled pylon selected to meet the design and operational criteria of the new overhead line alignment and will be within the parameters outlined within the Application of maximum footprint 20m x 20m and maximum height of 59.2m and will be similar in design (steel lattice) and colour to the existing pylons in the immediate area.
015	Plot 126, over which rights of temporary possession are sought, includes part of the residential curtilage to my home. A variety of trees, shrubs and hedges are planted and a fence is erected on this land to screen my land and particular my house from the B1121 which are necessary for the quiet enjoyment of my property.	Plot 126 is located on the unregistered highway verge and temporary rights are sought to clear vegetation to increase the visibility swathes on the approach to the new operational access for the substations.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
016	The scope of this work as it affects my land is unclear. Further the need for it to be conducted on my land has not been justified. The applicant has not stated how long the temporary rights over Plot 126 will be required for or when the work will be conducted.	In reference to Plot 126, this refers to the potential temporary works in relation to vegetation clearance off the highway to increase the visibility swathes on the approach to the new operational access for the substations. This would be subject to further investigation nearer the time of construction to confirm what, if any, vegetation would be required to be cleared.
017	Plots 117 and 117A include/are immediately adjacent to the access to my property and the works may prevent access. This amounts to a disproportionate interference with my use and enjoyment of the land.	The overhead line diversion works will not prevent access to the property. All construction work will be carried out in Plots 115 and 116. Work to be undertaken near Plot 117A would be the assembly and erection of temporary netted scaffold protection required over the B1121 crossing during stringing works as well vegetation clearance as referenced above. This would not require any closure of existing accesses to the property.
018	Despite the impact of this work on my use and enjoyment of my land at no point has the applicant or its representatives consulted me about this element of the projects.	The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29 th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)). The applicant has arranged and attended meetings with representatives from NGET and objector on the proposed works as outlined and responded email on the 21 st November 2019 confirming the details of what was discussed in a meeting between the parties on the 17 October 2019.
019	Finally, I am concerned that this DCO is being used to acquire rights and build infrastructure that will facilitate future projects, particularly grid connections for the proposed National Grid Ventures Nautilus and Eurolink Interconnector projects and the substantial expansion of the Galloper and Greater Gabbard windfarms. The cumulative impact of these projects on my land and my	National Grid infrastructure forms part of the Development Consent Order (DCO) application as described in (Chapter 6 Project Description (APP-054)) is designed to provide the necessary grid infrastructure for the East Anglia TWO and East Anglia ONE North only. A cumulative impact assessment (CIA) has been carried out for each of the considered receptor topics in chapters 7 to 30 (APP 055-078) of the Environmental Statement. The approach used for the CIA follows Planning Inspectorate Advice Note 17. Where it is helpful to do so 'Tiers' of these projects'



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	rights, as well as the natural and historic environment has not been properly assessed.	<p>development statuses have been defined as well as the availability of information to be used within the CIA. This approach is based on the three tier system proposed in Planning Inspectorate Advice Note 17 as summarised in the following:</p> <ul style="list-style-type: none"> • Tier 1 – Projects under construction, permitted or submitted applications; • Tier 2 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has</u> been submitted; and • Tier 3 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has not</u> 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. <p>Tier 1 and Tier 2 projects are included in all relevant CIAs within the ES. Generally, Tier 3 projects have not been included within each CIA due to insufficient information available on which to base an assessment, in line with Advice Note 17.</p> <p>The following projects were not considered in the CIA because at the time the Project CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales):</p> <ul style="list-style-type: none"> • Nautilus; • EuroLink; • Greater Gabbard Offshore Windfarm Extension; and • Galloper Offshore Windfarm Extension. <p>Each of these projects is nationally significant and therefore will require its own EIA and as part of that will need to undertake a cumulative assessment. Each of the above projects will consider the Project in each of their respective EIAs as they progress through the planning process.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.14 Mike Lewis (RR-512)

Table 28 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Mike Lewis RR-512	103	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner
	100	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner (in respect of subsoil beneath half width of public highway)

Table 29 Applicant's Comments on Mike Lewis' Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	Dear Examining Authority, I wish to object to this Scottish Power Renewables (SPR) planning application for the following reasons:- I support all the points made by the SASES group and Friston Parish Council.	The points raised in the SASES Relevant Representation have been considered and are addressed in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1). The points raised in Friston Parish Council's Relevant Representation have also been considered and are addressed in <i>Table 9 of Applicant's Comments on Relevant Representations Volume 3</i> (document reference ExA.RR3.D0.V1).
002	Cumulative impact on local communities of up to 7 energy projects occurring consecutively over 12 - 15 years.	The cumulative impacts of all projects have been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter: Please see <i>Table 5 in Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

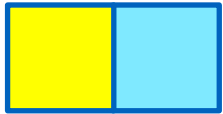
No.	Relevant Representation	Applicant's Comments
003	Use of unspoilt countryside at Friston for substation complexes the size of Wembley stadium. These buildings being close to and dominating the whole village, with many large structures, access points and haul roads dominating the whole village. Some being feet - not yards - from residential property.	<p>These matters have been raised in other Relevant Representations and topic responses have been prepared:</p> <p>Please see Table 22 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – size of substations.</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p>
004	The local road network being unsuitable for heavy traffic and HGVs, during and after the construction process. The result will endanger motorists, cyclists and pedestrians. This will also hamper the movement of emergency vehicles and also the normal work of refuse collection, public transport and delivery and collection services.	<p>This matter has been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
005	Insufficient consideration of National security issues including any existing nuclear evacuation plans.	<p>This matter has been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 49 in Applicant's Comments on Relevant Representations Volume 3 (document reference ExA.RR3.D0.V1) for the Applicant's comments on Relevant Representations regarding Office for Nuclear Regulation.</p>
006	Macro and micro economic issues - As far as the former is concerned it is probably outside the remit of this examining Authority as decisions will be made at Government level. The latter is of great relevance locally.	Chapter 30 Tourism, Recreation and Socio-Economics (AP-078) presents the assessment of socio-economic, tourism, and recreation effects for the Projects at a level that is appropriate for an Environmental Statement in line with the overarching NPS in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5).



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
007	The main economy of Friston is tourism which generates wealth and employment for other business's and trades people. Tourists will not visit Friston if it has been converted into an industrial landscape.	This matter has been raised in other Relevant Representations and a topic response has been prepared: Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.
008	Residential properties - house buyers will not be attracted if the equity of properties is heading downwards - a process which is already happening.	This matter has been raised in other Relevant Representations and a topic response has been prepared: Please see Table 29 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – house prices.
009	Flooding - Scottish Power's proposal to mitigate the effect of increased flooding which they admit their proposals will exacerbate are inadequate, simplistic and misguided. SPR promised at a local meeting, to undertake a survey which the later retracted by letter. Unless and until an independent hydrological survey is undertaken at Friston a disaster looms.	This matter has been raised in other Relevant Representations and a topic response has been prepared: Please see Table 32 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding water resources and flood risk.
010	Indeed it is my personal opinion that SPR could not have chosen a worse location for their substations if they had tried.	This matter has been raised in other Relevant Representations and a topic response has been prepared: Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.
011	Verges – In SPR's book of reference my address is noted in respect of the road verges of my property - I have not been consulted by SPR on this matter so I must object to this to protect my interest.	Plot 103 to which this comment refers forms part of unadopted highway verge along Church Lane. The rule of 'ad medium filum' has been applied in respect of a boundary presumption that an owner of land which abuts either a public or private road (to the extent not otherwise recorded within separate ownership) also owns the subsoil of the road, up to the mid or centre point.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Permanent rights to install and maintain pipes to connect the Sustainable Drainage System into the local drainage network are being sought.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.15 Mr JH Rogers (RR-069)

Table 30 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Brown & Co on behalf of Mr J H Rogers RR-069	113, 129, 130, 135	Freehold Purchase	in respect of rights of access to construct and maintain services and boundary fences
	131, 133	Freehold Purchase	Owner

Table 31 Applicant's Comments on Mr JH Roger's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>TIMING OF CONSTRUCTION WORK</p> <p>To date, SPR have been unable to advise in any detail on the likely timing for the construction of the Project, EA2, nor how its development will be tied into the other associated Project, EA1 (North), the subject of a second Development Consent Order. Mr Rogers is concerned about the cumulative impact of the two Projects, if built separately, and believes that it is essential that both are built simultaneously to mitigate the effect on his property and the resulting disturbance caused.</p>	<p>The draft development Consent Orders (DCOs) require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners and occupiers and continue to communicate likely timings of construction.</p> <p>The East Anglia TWO offshore windfarm project and East Anglia ONE North offshore windfarm project are two separate projects which are the subject of two separate DCO applications.</p> <p>At this stage it is not known whether both projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p> <ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>In fully assessing the above scenarios within each ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.</p> <p>Chapter 6 of the ES (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months. Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months. National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months.
002	<p>NOTICE OF ENTRY</p> <p>Should the Development Consent Order be approved, Mr Rogers considers that property owners and occupiers will require a minimum 12 month period of Notice (ideally 18 months) prior to entry being taken to their land to minimise crop loss and disturbance arising therefrom.</p>	<p>The length of notice that would be provided on a statutory basis is 14 days. In practice, the Applicant will work constructively with landowners, occupiers and their representatives and communicate proposed entry dates giving as much notice is practical possible.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
003	<p>ABOVE AND BELOW GROUND STRUCTURES</p> <p>Jointing Bays should all be located underground, so as not to interfere with normal agricultural operations. Should Link Boxes be required, then these should be located within a tight cluster set level to the surrounding ground level (save as where otherwise agreed) within or adjacent to field boundaries. Our preference is that all Link Boxes are located within field boundaries. No clarification has been received from SPR as to how many, if any, Link Boxes will be required.</p>	<p>Chapter 6 Project Description (APP-054) advises that jointing bays installed underground and will be constructed at intervals along the onshore cable route (to allow cable pulling and jointing at a later stage), one jointing bay per trench. Each jointing bay would be up to 15m long x 3m wide x 1.7m deep; if double jointing bays (i.e. a double jointing bay for both trenches) are constructed these will be up to 15m long x 9m wide x 2.5m deep. The precise location of the jointing bays will be determined during detailed design; however, the jointing bays will be located at a minimum of 55m from residential dwellings.</p> <p>Link boxes will be installed underground, and the precise location of the link boxes will be determined during detailed design.</p>
004	<p>FIELD DRAINAGE</p> <p>Drainage consultants with relevant practical experience and experience of working in Suffolk will need to be engaged by SPR to carry out a pre and post construction assessments of the impact that the proposed construction of the onshore infrastructure associated with the Project, EA2, will have or has had on drainage and, prior to undertaking any proposed drainage schemes, will consult with landowners and occupiers and their appointed drainage consultant on the design of any land drainage works required in connection with the construction works and on the design of any land drainage works required for the subsequent restoration of drainage on the landowners' / occupiers retained land.</p>	<p>The Applicant is obliged to produce a Surface Water and Drainage Management Plan to reflect the final project design as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan is will be made available ahead of the commencement of construction.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
005	<p>SOIL MANAGEMENT</p> <p>The treatment and reinstatement of soil during and after construction is one of the main issues of concern. Limited information has been provided, to date, to landowners and occupiers. It is noted from the Outline Code of Construction Practice, reference to the preparation of a Soil Management Plan and that the appointed contractor will be required to comply with this. Mr Rogers has not had the opportunity to review or comment upon this, but the following requirements should be included, as a minimum;</p> <ul style="list-style-type: none"> • prior to the commencement of work, detailed testing should be undertaken to establish existing soil nutrient values and soil profiles over both the working areas and adjacent land which will be sterilised from production; • details of soils handling, storage, management and reinstatement; • details of post completion soils testing and aftercare management. 	<p>The Applicant is obliged to produce a Soil Management Plan to reflect the final project design as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Soil Management Plan is will be made available ahead of the commencement of construction.</p> <p>The Applicant will work constructively with landowners, occupiers and their representatives with regards to soil management.</p>
006	<p>IRRIGATION It is noted that the Outline Code of Construction Practice does not address the issue of management and maintenance of individual landowners and occupiers field irrigation systems. Mr Rogers considers that the following requirements should be included as a minimum;</p>	<p>The Applicant has had productive and continuing discussions with the respondent with regards to the maintenance of irrigation systems during construction and any necessary pre or post construction works required to the respective irrigation systems.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<ul style="list-style-type: none"> • prior to the commencement of work, all field irrigation systems in the vicinity of the works should be identified and recorded. • following consultation with individual landowners and occupiers, independent irrigation consultants / contractors should be appointed to advise on both temporary and, where necessary, permanent diversions of irrigation mains to ensure that throughout the construction period SPR maintain water supplies to any areas severed by the works, to ensure that all previously land capable of irrigation remains so. 	
007	<p>FLOOD ISSUES</p> <p>No details have been provided to landowners and occupiers on how any increase in surface water run off from the haul road and the temporary working areas will be managed and dissipated during the construction period. Clarification of this should be provided by SPR as part and parcel of the planning process.</p>	<p>There is a commitment to producing a Surface Water and Drainage Management Plan as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan is will be available will be made available ahead of the commencement of construction.</p>
008	<p>DUST</p> <p>Clarification is required on how practical issues, like dust arising from the works, will be controlled during the construction period.</p>	<p>An Air Quality Management Plan (AQMP) is required to be included within the Code of Construction Practice (CoCP) which must be submitted to the Local Planning Authority for approval prior to commencement of the works. The AQMP will detail control measures to manage dust and emission during construction works. This is a matter has been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
009	<p>ACCESS</p> <p>If the Development Consent Order is confirmed, defined routes of access for pre-construction works, the construction work and post commencement remedial works and maintenance will need to be agreed with individual landowners and occupiers.</p>	<p>The Applicant has had productive and continuing discussions with the respondent with regards to the appropriate routes of access and egress.</p>
010	<p>It is noted that no detail has, to date, been provided to landowners and occupiers as to how they will access land severed by the construction works, which will need to be agreed prior to the commencement of the work.</p>	<p>Upon confirmation of the detailed design, the Applicant will work constructively with landowners, occupiers and their representatives with regards to access to severed land.</p>
011	<p>WORKING HOURS</p> <p>The proposed working hours within the Outline Code of Construction Practice of 7.00am to 7.00pm, Monday to Friday and 7.00am to 1.00pm on Saturday's, with no construction works on Sundays or Bank Holidays, are acceptable and should be confirmed in the Development Consent Order to enable enforcement.</p>	<p>Construction activities would normally be conducted during Monday to Friday working hours of 7am to 7pm and Saturday working hours of 7am to 1pm. Working hours are not proposed for Sundays or Bank Holidays. These working hours have been reduced on Saturdays from those originally proposed following feedback received from Section 42 consultation. Exceptions to these working hours for the works are described in section 6.9 of Chapter 6 Project Description (APP-054), for the landfall, onshore cable route and onshore substation include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the ES, such as concrete pouring, dewatering, cable pulling, cable jointing and HDD; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

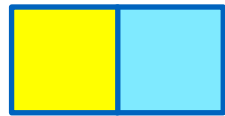
No.	Relevant Representation	Applicant's Comments
		<p>For the National Grid infrastructure, these exemptions include:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; • Fitting out works associated with the National Grid substation; • The completion of construction activities commenced during the approved working hours which cannot safely be stopped; • The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>Working hours are secured through Requirement 23 and Requirement 24 of the draft DCO (APP-023) and will be signposted within the final Code of Construction Practice prepared post-consent to discharge Requirement 22 of the draft DCO (APP-023). The final Code of Construction Practice must accord with the Outline Code of Construction Practice (APP-578) submitted with the Application, which provides detail on working hours within section 3.1.</p>
012	<p>CONSTRUCTION MITIGATION MEASURES</p> <p>We note from the Outline Code of Construction Practice, that noise and vibration management measures are to be implemented during the construction period and brief details of these are provided. We would ask that as a minimum, more detailed consideration of physical mitigation measures that could be undertaken during the construction period to minimise disturbance to local residents are considered, including strategic banking of topsoil to form an acoustic bund. In</p>	<p>The Applicant notes the comment made, this has been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Of particular relevance to this comment and in response to the query raised by the respondent, please see an extract of this document below:</p> <p>Construction phase noise will be controlled through the production of a Construction Phase Noise and Vibration Management Plan post-consent, which is to be submitted to</p>

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
	particular Mr Rogers considers that at the outset of the development, stripped topsoil from the development site should be used to form an acoustic bund between his property and the development site to enable the subsequent planting of semi-mature trees, shrubs and hedging in the first planting season thereafter to mitigate the noise emanating from the development site (please see 'Landscaping' below).	<p>and approved by the local planning authority in advance of construction works commencing, as part of the Code of Construction Practice secured under Requirement 22 of the <i>draft DCO</i> (APP-023). The specific control measures set out within the Construction Phase Noise and Vibration Management Plan will be complied with during the construction phase. Best practice noise mitigation measures, to be implemented and controlled through the Construction Phase Noise and Vibration Management Plan (in relation to the installation of the onshore cable route), will typically include:</p> <ul style="list-style-type: none"> • Management of construction operating hours; • Use of screens and noise barriers / acoustic screens. • Construction site layout to minimise or avoid reversing with use of banksmen where appropriate. Output noise from reversing alarms set at levels for health and safety compliance. • Use of modern, fit for purpose, well maintained plant and equipment to minimise noise generation. Plant and vehicles will be fitted with mufflers /silencers maintained in good working order. Use of silenced equipment, as far as possible and low impact type compressors and generators fitted with lined and sealed acoustic covers. Doors and covers housing noise emitting plant will be kept closed when machines are in use. • No audible music or radios to be played outdoors on site. • Ensuring engines are switched off when machines are idle. • Regular communication with site neighbours to inform them of the construction schedule, and when noisy activities are likely to occur.
013	<p>DEVELOPMENT MITIGATION – LANDSCAPING</p> <p>The documentation in support of the Development Consent Order indicates that a belt of trees are proposed to be planted between Friston Moor Farm Barn and the development site for the transformers</p>	<p>The Applicant has had productive and continuing discussions with the respondent with regards to the <i>Outline Landscape and Ecological Management Strategy</i> (APP-584).</p> <p>The Applicant notes the comments made in relation to the proposed landscaping and this has been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on the matter:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>and sub-stations. Whilst this is welcomed, despite repeated requests to alter the 'angle' and 'extent' (length) of the landscaping belt, SPR have to date been unable to provide further assurance that such constructive comments will form part of the final consideration for the development to ensure that the development is adequately screened in the long term from the property. It is requested that before the Development Consent Order is confirmed, property owners in the immediate vicinity of the development be given the chance to directly comment to the Planning Inspector on the suitability of proposed landscaping proposals.</p>	<p>Please see Table 13 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.</p> <p>Of particular relevance to these comments is the extract below:</p> <p><u>Background</u></p> <p>One substation is required for the Project together with one National Grid substation. It is proposed that they will be sited adjacent to each other.</p> <p>The purpose of the onshore substation is to convert the electrical current from HVAC cables into appropriate voltage for the National Grid substation to connect into the national electricity grid.</p> <p>From the outset, careful siting of the onshore substation and National Grid substation has set out to avoid key areas of sensitivity wherever possible. As described in section 4.9.1.3 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) and Table 26 of Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) this includes an initial target buffer of 250m from residential properties being applied as a proxy for minimising disturbance to residents. It is recognised that substation locations may encroach into this buffer once a final arrangement is determined.</p> <p>Embedded landscape mitigation has included:</p> <ul style="list-style-type: none"> • Careful siting of the onshore substation (and National Grid substation) to the west and south of existing woodland blocks to gain maximum benefit from existing screening; • Careful siting of the onshore substation and National Grid substation in close proximity to the existing overhead lines to reduce additional cabling requirements and to minimise proliferation of infrastructure; and • Siting the onshore substation and National Grid substation in an area of low flood risk (Flood Zone 1).



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Further detail on the implementation and micro-siting of the onshore substation is provided within the Scheme Implementation Report (APP-596).</p> <p><u>Landscape and Visual Impacts from the Project and National Grid Substations</u></p> <p>The potential landscape and visual impacts of the onshore substation and National Grid infrastructure during construction and operation are assessed in full in Appendix 29.3 (APP-393) and 29.4 (APP-394) and summarised in Table 29.9 of Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p><u>Landscape and Visual Impacts during Construction</u></p> <p>Potential landscape and visual impacts during construction of the onshore substation and national grid infrastructure are assessed in sections 29.6.1.3.1 and 29.6.1.3.2 of Chapter 29 Landscape and Visual Impact Assessment respectively and summarised below.</p> <p>The construction of the onshore substation and National Grid infrastructure will have no significant effects in EIA terms on the character or special qualities of the AONB³⁴. The onshore substation and National Grid infrastructure are located outside the AONB and its immediate setting, approximately 1.6km to the north of the AONB at its closest point (where the AONB covers the estuary of the River Alde) and 3.7km to the west of the edge of the main 'coastal' area of the AONB (near Aldringham (Area A)). The special qualities of the AONB will not be subject to change as a result of the construction of the onshore substation and National Grid infrastructure, primarily due the distance of the construction of the onshore substation and National Grid infrastructure from the AONB, their limited visibility from within the AONB and the lack of any changes to the pattern of elements within AONB.</p> <p>The existing landscape at the substation location provides screening and restricts the extent of visibility of the substation from the viewpoints assessed. However, despite this, the construction of the onshore substation and National Grid infrastructure are assessed</p>

³⁴ EDF Energy, Suffolk Coast and Heaths AONB Partnership, Suffolk County Council, Suffolk Coastal District Council and Waveney District Council (2016) Suffolk Coast and Heaths AONB - Natural Beauty and Special Qualities Indicators



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

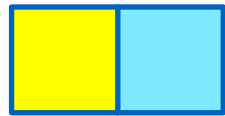
No.	Relevant Representation	Applicant's Comments
		<p>as having significant in EIA terms visual effects on residents of localised areas on the edges of Friston (not from Friston as a whole), as represented by Viewpoints 1, 2, 4, and 9; people walking on the local public right of way network to the north of Friston (between Friston and Fristonmoor) as represented by Viewpoints 2 and 5; residents of scattered rural dwellings near Friston, as represented by Viewpoints 5 and 8; motorists travelling on the B1121 Saxmundham Road, to the north of Friston, as represented by Viewpoint 8; and motorists/cyclists travelling on Grove Road immediately passing the onshore substation and National Grid substation, between Friston and Grove Wood/Manor Farm, as represented by Viewpoint 14.</p> <p>These significant in EIA terms visual effects would all occur within approximately 1.2km of the onshore substation and National Grid substation, making them localised, and they will also occur temporarily over the short-term, during the construction period. These significant in EIA terms visual effects occur where the construction of the onshore substation and National Grid infrastructure will be visible at relatively close distances, generally resulting in medium to high changes to views, due to the size, extent and close proximity of the onshore substation, National Grid infrastructure and construction consolidation sites (CCS), together with fencing, access road, vehicles, machinery, cranes, accommodation and the stockpiling of subsoil/topsoil needed during the construction period. During the construction period, the built form of the onshore substation and National Grid infrastructure will take shape during the construction and installation. With progress through the construction period, the built forms of the constructed infrastructure will increase the influence of buildings and infrastructure, such that electrical infrastructure becomes one of the prevailing features of these views.</p> <p><u>Landscape and Visual Impacts during Operation</u></p> <p>Potential landscape and visual impacts during operation of the onshore substation and national grid infrastructure are assessed in sections 29.6.2.2.1 and 29.6.2.2.2 of Chapter 29 Landscape and Visual Impact Assessment (APP-077) respectively and summarised below.</p> <p>Significant in EIA terms effects on the character of the landscape are assessed as occurring within a localised area of approximately 1km around the onshore substation</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>and National Grid infrastructure. The presence of the onshore substation and National Grid infrastructure will result in a large-scale change to the local character of this area of approximately 1km around the onshore substation and National Grid infrastructure within the Friston area of the Ancient Estate Claylands landscape character type (LCT) (01).</p> <p>Significant in EIA terms effects on the perceived landscape character of the Estate Sandlands LCT also occur from a localised area within 1km of the National Grid substation, mainly to the south and west, where the effects on the character of this LCT are more readily experienced (compared to areas to the east and south-east, which benefit from substantial intervening screening). At the local level, the character of the Estate Sandlands LCT is not readily differentiated from the Ancient Estate Claylands LCT, with the local areas to the north of Friston forming a distinct and consistent landscape setting. The onshore substation and National Grid substation would exert a locally characterising effect in these areas in close proximity to the site, however moving outwards and away from the site, they would exert a reduced effect upon landscape character where the surrounding landscape will increase in characterising influence, reasserting its overall baseline influence on character further afield.</p> <p>The operation of the onshore substation and National Grid infrastructure will have no significant in EIA terms effects on the character or special qualities of the AONB. The onshore substation and National Grid infrastructure are located outside the AONB and its immediate setting, approximately 1.6 km to the north of the AONB at its closest point (where the AONB covers the estuary of the River Alde) and 3.7 km to the west of the edge of the main 'coastal' area of the AONB (near Aldringham (Area A)). The special qualities of the AONB will not be subject to change as a result of the operation of the onshore substation and National Grid infrastructure due the distance of the onshore substation and National Grid infrastructure from the AONB and their limited visibility from within the AONB.</p> <p>Despite the notable screening provided in the local landscape, the operation of the onshore substation and National Grid infrastructure are assessed as having significant in EIA terms visual effects on residents of parts of Friston, as represented by Viewpoints 1, 2, and 9; people walking on the local public right of way network to the north of Friston</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

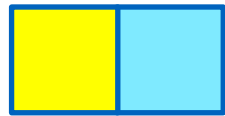
No.	Relevant Representation	Applicant's Comments
		<p>(between Friston and Fristonmoor) as represented by Viewpoints 2, 5; residents of scattered rural dwellings near Friston, as represented by Viewpoints 5 and 8; and motorists/cyclists travelling on Grove Road immediately passing the onshore substation and National Grid infrastructure, between Friston and Grove Wood/Manor Farm, as represented by Viewpoint 14 Grove Road. Photomontage visualisations showing the predicted views of the onshore substation and National Grid infrastructure during the first year of the operational phase are shown in Figures 29.13 – 29.26 (APP-404 to APP-417).</p> <p>These significant in EIA terms visual effects would all occur within approximately 1.2km of the onshore substation and National Grid infrastructure, making them localised and they will also occur over the long-term, during a 10 to 15 year period until areas of woodland planted as part of the landscape mitigation plan (Figure 29.11a-b (APP-401 and APP402) and Figure 29.12 (APP-403)) are expected to provide effective screening. Woodland trees either planted as part of the onshore site preparation works or at the end of the construction phase in order to screen features in the early stages of the operational period.</p> <p>The significant localised visual effects occur where the operational onshore substation and National Grid infrastructure will be visible at relatively close distances within approximately 1.2km, resulting in medium to high magnitudes of change to views, due to the size, extent and close proximity of the onshore substation and National Grid infrastructure, together with fencing, access road and vehicles during the operational period. During the early part of the operational period, the complex built form of the onshore substation and National Grid infrastructure will have a prevailing or notable influence in these views from the local area. The National Grid overhead realignment works will also change the appearance of the overhead line and pylons in views, consisting of one new pylon and the modification or replacement of up to three existing pylons, and the diversion of the northern overhead line route. The sealing end compounds will also be visible, particularly in views from the north, allowing the existing 400kV overhead electrical conductors (wires) to be brought down from the pylons up to</p>

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
		<p>four new sealing end compounds and then connected via underground cable to the National Grid substation.</p> <p>The potential landscape and visual effects of the onshore substation and National Grid infrastructure during the operational period are assessed in full in Appendix 29.3 (APP-567) and 29.4 (APP-568) and summarised in Table 29.10 of the chapter. The effects during the operation of the onshore substation and National Grid substation for each of the assessed receptors are summarised in Table 29.10 of the chapter at the first year of the operational phase and the residual effects with embedded mitigation at 15 years post construction, when the landscape mitigation described in section 29.3.3.1 of the chapter is predicted to provide effective screening.</p> <p><u>Cumulative Landscape Impacts</u></p> <p>Cumulative landscape impacts are discussed in Tables 12 and 13 of Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1)</p>
014	<p>CREATION OF NEW PUBLIC RIGHTS OF WAY</p> <p>The documentation in support of the Development Consent Order proposes the creation of additional public rights of way over the land to be acquired by SPR for the development of the new transformer and sub-station site. It is requested that the location / positioning of the proposed new rights of way are discussed in detail with the adjoining property owners so as to mitigate their privacy and security, which is now at threat.</p>	<p>Upon confirmation of the detailed design, the Applicant will work constructively with landowners, occupiers and their representatives with regards to Public Rights of Way (PRoW). In developing the proposed route for any new PRoW the Applicant would seek to protect the respondent's privacy and security through further discussions and communications.</p>
015	<p>ALTERNATIVE LANDFALL OPTIONS</p> <p>We are aware that the Government are considering an alternative strategy for delivery of the energy produced by offshore windfarms to the National</p>	<p>The construction of an offshore ring main has been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	Grid, with an emphasis to rationalise the number of individual connections and cable route requirements through the construction of an offshore ring main. The question arising from this given the potential timescale for the development of this Project, is whether due consideration has been given to the likelihood of this option and therefore the potential removal of the need to development both the cable route and transformer site as currently proposed.	Please see Table 17 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding the offshore ring main.



2.16 Mrs Ann Dallas (RR-255)

Table 32 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Berrys on behalf of Mrs Ann Dallas RR-255	94	Freehold Purchase	in respect of right to use and maintain ditch for the passage of surface water
	136, 137	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	138	Temporary Occupation and Use	in respect of restrictive covenants
	144	Temporary Occupation and Use	in respect of right to use and maintain ditch for the passage of surface water
	139, 140, 141	Temporary Occupation and Use	Owner
	92, 93	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right to use and maintain ditch for the passage of surface water

Table 33 Applicant's Comments on Mrs Ann Dallas' Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	From Berrys on behalf of Mrs Ann Dallas Mrs Ann Dallas ("the objector") owns and occupies Peartree Farm IP17 1TN and is therefore one of the closest residents to the proposed substation. The objector	The points raised in the SASES and the Friston Parish Council Relevant Representations have been considered and are addressed in Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) and in Table 9 in Applicant's Comments on



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	supports and repeats the representations submitted by Substation Action Save East Suffolk (SASES) and Friston Parish Council. The following is a brief summary of the other main aspects the objector disagrees with and why, which may be followed by a Written Representation: -	Relevant Representations Volume 3 (document reference ExA.RR3.D0.V1) respectively.
002	No explanation of how the scheme will affect the objector. The applicant sent a USB containing 577 files but did not explain how the scheme will affect the objector with reference to specific files on the USB. If present, the information specifically relevant to the objector is buried in the volume of documents received which is disingenuous and a breach of duty.	<p>The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p> <p>The Environmental Statement has provided appropriate impact assessment on residential receptors in line with the overarching NPS in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5). The potential impact on residential receptors has been considered throughout the development of the Project and this is reflected in the site selection process reported in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). In addition, the potential effects on residential receptors and residents has been further considered and evaluated in other topic specific chapters, including Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 74 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>The Applicant's appointed land agents issued a letter on the 8th October 2019 outlining the reason for the property is included in the Order Land. Further information was supplied by National Grid (NGET) providing a copy of the existing agreement for National Grid Electricity Plc's existing equipment direct to the landowner's appointed agent, copies of which have been supplied to the landowner.</p> <p>As detailed in the Statement of Reasons (APP-026) plots 139, 140 and 141 will be used temporarily for areas for works associated with National Grid</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		infrastructure and for access to these works, including any ancillary works necessary to facilitate said access.
003	No engagement with the objector who is a key receptor. Aside from receiving notice of acceptance of the application and the USB, the objector has not been engaged with at all by the applicant. The objector's agent sent enquiries to the email provided and to the liaison officer for the ONE project seeking clarification but received no response.	<p>The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p> <p>In response, the Applicant's appointed land agents issued a letter on the 8th October 2019 outlining the reason for the property is included in the Order Land. Further information was supplied by National Grid (NGET) providing a copy of the existing agreement for National Grid Electricity Plc's existing equipment direct to the landowner's appointed agent, copies of which have been supplied to the landowner. The Applicant notes queries raised in relevant representations regarding the consultation undertaken by National Grid.</p> <p>National Grid infrastructure forms part of the Development Consent Order (DCO) application (Chapter 6 Project Description (APP-054)). National Grid is a development partner for the Project and the Applicant has engaged in consultation on behalf of National Grid.</p>
004	No photographic montages provided to demonstrate visual impact. The documents include a "Proposed Planting Plan", however it is not clear what will remain visible until the planting is established and thereafter. The applicant proposes developing the final design post consent, however this will limit the influence that key receptors can have on design.	<p>The Applicant has provided all submission documents (including photomontages - AIS: Figure 29.13 (APP-404) to Figure 29.32 (APP-417), Illustrative viewpoints: Figure 29.27 (APP-418) to Figure 29.32 (APP-423) and GIS: Figure 29.33 (APP-424) to Figure 29.46 (APP-437)) to the respondent as part the statutory notification of acceptance of the applications for examination required under Section 56 of the Planning Act 2008. The respondent has, within the representation, previously confirmed receipt of the USB stick containing these documents. The photomontages show staged development of the planting proposed in the OLEMS (APP-584) at specific stages of growth.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The Applicant notes the comment made regarding proposed planting and that this has been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 13 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.</p> <p>Of particular relevance to this comment is the extract below:</p> <p><u>Background</u></p> <p>One substation is required for the Project together with one National Grid substation. It is proposed that they will be sited adjacent to each other.</p> <p>The purpose of the onshore substation is to convert the electrical current from HVAC cables into appropriate voltage for the National Grid substation to connect into the national electricity grid.</p> <p>From the outset, careful siting of the onshore substation and National Grid substation has set out to avoid key areas of sensitivity wherever possible. As described in section 4.9.1.3 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) and Table 26 of Applicant's Comments on Relevant Representations Volume 2 (ExA.RR2.D0.V1) this includes an initial target buffer of 250m from residential properties being applied as a proxy for minimising disturbance to residents. It is recognised that substation locations may encroach into this buffer once a final arrangement is determined.</p> <p>Embedded landscape mitigation has included:</p> <ul style="list-style-type: none"> • Careful siting of the onshore substation (and National Grid substation) to the west and south of existing woodland blocks to gain maximum benefit from existing screening; • Careful siting of the onshore substation and National Grid substation in close proximity to the existing overhead lines to reduce additional cabling requirements and to minimise proliferation of infrastructure; and

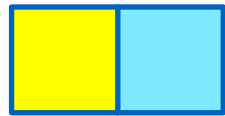


Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Siting the onshore substation and National Grid substation in an area of low flood risk (Flood Zone 1). <p>Further detail on the implementation and micro-siting of the onshore substation is provided within the <i>Scheme Implementation Report</i> (APP-596).</p> <p><u>Landscape and Visual Impacts from the Project and National Grid Substations</u></p> <p>The potential landscape and visual impacts of the onshore substation and National Grid infrastructure during construction and operation are assessed in full in Appendix 29.3 (APP-393) and 29.4 (APP-394) and summarised in Table 29.9 of Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p><u>Landscape and Visual Impacts during Construction</u></p> <p>Potential landscape and visual impacts during construction of the onshore substation and national grid infrastructure are assessed in sections 29.6.1.3.1 and 29.6.1.3.2 of Chapter 29 Landscape and Visual Impact Assessment respectively and summarised below.</p> <p>The construction of the onshore substation and National Grid infrastructure will have no significant effects in EIA terms on the character or special qualities of the AONB³⁵. The onshore substation and National Grid infrastructure are located outside the AONB and its immediate setting, approximately 1.6km to the north of the AONB at its closest point (where the AONB covers the estuary of the River Alde) and 3.7km to the west of the edge of the main 'coastal' area of the AONB (near Aldringham (Area A)). The special qualities of the AONB will not be subject to change as a result of the construction of the onshore substation and National Grid infrastructure, primarily due the distance of the construction of the onshore substation and National Grid infrastructure from the AONB, their limited visibility from within the AONB and the lack of any changes to the pattern of elements within AONB.</p>

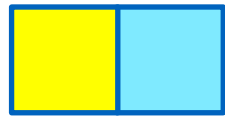
³⁵ EDF Energy, Suffolk Coast and Heaths AONB Partnership, Suffolk County Council, Suffolk Coastal District Council and Waveney District Council (2016) Suffolk Coast and Heaths AONB - Natural Beauty and Special Qualities Indicators



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

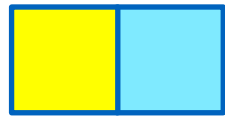
No.	Relevant Representation	Applicant's Comments
		<p>The existing landscape at the substation location provides screening and restricts the extent of visibility of the substation from the viewpoints assessed. However, despite this, the construction of the onshore substation and National Grid infrastructure are assessed as having significant in EIA terms visual effects on residents of localised areas on the edges of Friston (not from Friston as a whole), as represented by Viewpoints 1, 2, 4, and 9; people walking on the local public right of way network to the north of Friston (between Friston and Fristonmoor) as represented by Viewpoints 2 and 5; residents of scattered rural dwellings near Friston, as represented by Viewpoints 5 and 8; motorists travelling on the B1121 Saxmundham Road, to the north of Friston, as represented by Viewpoint 8; and motorists/cyclists travelling on Grove Road immediately passing the onshore substation and National Grid substation, between Friston and Grove Wood/Manor Farm, as represented by Viewpoint 14.</p> <p>These significant (in EIA terms) visual effects would all occur within approximately 1.2km of the onshore substation and National Grid substation, making them localised, and they will also occur temporarily over the short-term, during the construction period. These significant (in EIA terms) visual effects occur where the construction of the onshore substation and National Grid infrastructure will be visible at relatively close distances, generally resulting in medium to high changes to views, due to the size, extent and close proximity of the onshore substation, National Grid infrastructure and construction consolidation sites (CCS), together with fencing, access road, vehicles, machinery, cranes, accommodation and the stockpiling of subsoil/topsoil needed during the construction period. During the construction period, the built form of the onshore substation and National Grid infrastructure will take shape during the construction and installation. With progress through the construction period, the built forms of the constructed infrastructure will increase the influence of buildings and infrastructure, such that electrical infrastructure becomes one of the prevailing features of these views.</p> <p><u>Landscape and Visual Impacts during Operation</u></p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Potential landscape and visual impacts during operation of the onshore substation and national grid infrastructure are assessed in sections 29.6.2.2.1 and 29.6.2.2.2 of Chapter 29 Landscape and Visual Impact Assessment (APP-077) respectively and summarised below.</p> <p>Significant (in EIA terms) effects on the character of the landscape are assessed as occurring within a localised area of approximately 1km around the onshore substation and National Grid infrastructure. The presence of the onshore substation and National Grid infrastructure will result in a large-scale change to the local character of this area of approximately 1km around the onshore substation and National Grid infrastructure within the Friston area of the Ancient Estate Claylands landscape character type (LCT) (01).</p> <p>Significant (in EIA terms) effects on the perceived landscape character of the Estate Sandlands LCT also occur from a localised area within 1km of the National Grid substation, mainly to the south and west, where the effects on the character of this LCT are more readily experienced (compared to areas to the east and south-east, which benefit from substantial intervening screening). At the local level, the character of the Estate Sandlands LCT is not readily differentiated from the Ancient Estate Claylands LCT, with the local areas to the north of Friston forming a distinct and consistent landscape setting. The onshore substation and National Grid substation would exert a locally characterising effect in these areas in close proximity to the site, however moving outwards and away from the site, they would exert a reduced effect upon landscape character where the surrounding landscape will increase in characterising influence, reasserting its overall baseline influence on character further afield.</p> <p>The operation of the onshore substation and National Grid infrastructure will have no significant (in EIA terms) effects on the character or special qualities of the AONB. The onshore substation and National Grid infrastructure are located outside the AONB and its immediate setting, approximately 1.6 km to the north of the AONB at its closest point (where the AONB covers the estuary of the River Alde) and 3.7 km to the west of the edge of the main 'coastal' area of the AONB</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>(near Aldringham (Area A)). The special qualities of the AONB will not be subject to change as a result of the operation of the onshore substation and National Grid infrastructure due the distance of the onshore substation and National Grid infrastructure from the AONB and their limited visibility from within the AONB.</p> <p>Despite the notable screening provided in the local landscape, the operation of the onshore substation and National Grid infrastructure are assessed as having significant in EIA terms visual effects on residents of parts of Friston, as represented by Viewpoints 1, 2, and 9; people walking on the local public right of way network to the north of Friston (between Friston and Fristonmoor) as represented by Viewpoints 2, 5; residents of scattered rural dwellings near Friston, as represented by Viewpoints 5 and 8; and motorists/cyclists travelling on Grove Road immediately passing the onshore substation and National Grid infrastructure, between Friston and Grove Wood/Manor Farm, as represented by Viewpoint 14 Grove Road. Photomontage visualisations showing the predicted views of the onshore substation and National Grid infrastructure during the first year of the operational phase are shown in Figures 29.13 – 29.26 (APP-404 to APP-417).</p> <p>These significant (in EIA terms) visual effects would all occur within approximately 1.2km of the onshore substation and National Grid infrastructure, making them localised and they will also occur over the long-term, during a 10 to 15 year period until areas of woodland planted as part of the landscape mitigation plan (Figure 29.11a-b (APP-401 and APP402) and Figure 29.12 (APP-403)) are expected to provide effective screening. Woodland trees, either planted as part of the onshore site preparation works or at the end of the construction phase.</p> <p>The significant localised visual effects occur where the operational onshore substation and National Grid infrastructure will be visible at relatively close distances within approximately 1.2km, resulting in medium to high magnitudes of change to views, due to the size, extent and close proximity of the onshore substation and National Grid infrastructure, together with fencing, access road and vehicles during the operational period. During the early part of the operational</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>period, the complex built form of the onshore substation and National Grid infrastructure will have a prevailing or notable influence in these views from the local area. The National Grid overhead realignment works will also change the appearance of the overhead line and pylons in views, consisting of one new pylon and the modification or replacement of up to three existing pylons, and the diversion of the northern overhead line route. The sealing end compounds will also be visible, particularly in views from the north, allowing the existing 400kV overhead electrical conductors (wires) to be brought down from the pylons up to four new sealing end compounds and then connected via underground cable to the National Grid substation.</p> <p>The potential landscape and visual effects of the onshore substation and National Grid infrastructure during the operational period are assessed in full in Appendix 29.3 (APP-567) and 29.4 (APP-568) and summarised in Table 29.10 of the chapter. The effects during the operation of the onshore substation and National Grid substation for each of the assessed receptors are summarised in Table 29.10 of the chapter at the first year of the operational phase and the residual effects with embedded mitigation at 15 years post construction, when the landscape mitigation described in section 29.3.3.1 of the chapter is predicted to provide effective screening.</p> <p><u>Cumulative Landscape Impacts</u></p> <p>Cumulative landscape impacts are discussed in Table 5 of Applicant's Comments on Relevant Representations Volume 2 (ExA.RR2.D0.V1).</p>
005	No explanation as to what any of the designations on the objector's land mean. The applicant has failed to make it clear why the objector's land is included in the development area, what for and how it is proposed to be used. The objector's land is designated as Land subject to Temporary Occupation and Use and as Work No 43 but we could find no explanation what any of this means.	<p>As detailed in the Statement of Reasons (APP-026) plots 139, 140 and 141 will be used temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access.</p> <p>Work No. 43 comprises areas required as temporary working areas for the purposes of constructing Work Nos. 39 and 40 including access. Both Work Nos. 39 and 40 relate specifically to the proposed works to the 400kV overhead line</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>network of which the overhead lines which currently oversail the property form part.</p> <p>While National Grid have confirmed that there are no realignment works proposed at the property, temporary works to include access and installation of temporary earthing to facilitate construction works for the re-alignment being undertaken as part of the wider 400kV reconfiguration (draft DCO (AP-023)) Work No. 39), can be carried out safely and with the adjacent high voltage circuit remaining in service.</p>
006	No plans showing extent of the overhead line realignment works. The objector's property is already blighted by two National Grid 24 conductor 400,000 volt overhead lines crossing in close proximity within 60 metres. The application refers to permanent realignment and temporary diversion of overhead lines, but we could not find any plans showing the proposed routes.	<p>Temporary works to towers to the east of 4ZX19/4ZW19 will include access and installation of temporary earthing to ensure construction works for the OHL re-alignment can be carried out safely, with the adjacent high voltage circuit remaining in service. As confirmed above, no realignment works are proposed at the property.</p> <p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains that the Project is based on a project design envelope (or 'Rochdale Envelope') approach. This involves definition of a range of parameters that enables the assessment of each impact to be conducted based on design parameters likely to result in the maximum adverse effect (i.e. the worst case scenario). It is recognised by the Planning Inspectorate Advice Note Nine that, at the time of submitting an application, offshore wind developers may not know the precise nature and arrangement of infrastructure and associated infrastructure that make up the proposed development. The Rochdale Envelope approach provides flexibility that is important to the Project as it prevents consent being granted for specific infrastructure or a particular layout which is not optimal or efficient at the time of construction.</p>
007	No plans showing location of underground lines and earthing. It is understood that up to six underground cables and up to two fibre optic cables with joining pits will be installed to connect into the substation. However, we	<p>The proposed route for the onshore cables is approximately 9km long and is shown in Figure 6.2 (APP-097).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	could not find any plans showing the routes of the underground cables and there is no mention of any earthing which will presumably also be required.	
008	No assurance of non-interference with private water supply. The objectors land benefits from a private water supply from a well that is 60ft deep and has a 10ft borehole, which is fed by an underground stream. No assurance has been received that water quality and level will be monitored and continuity of supply ensured during and after construction.	The Applicant can confirm that National Grid works would not have any impact upon their private water supply. In the unlikely event that such an impact did occur and was attributable to National Grid works, National Grid would rectify any such impact.
009	No suitable diversion of footpath from Little Moor Farm to Woodside Farm. The applicant is proposing to permanently stop up a historic footpath and redirect users through Laurel Covert and back on to the main Grove Road. The road could be avoided by providing a footpath through the planting to the east and south of the substation, to link back up with the footpath into Friston.	The assessment of impacts upon this specific PRoW from the project is presented within section 30.6.1.4.2.1 of Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). It identifies that there are two PRoW in the location of the onshore substation and National Grid infrastructure that will require permanent diversion (ID number: E-354/006/0 and E-387/009/0). This could result in a significant impact but will be mitigated through consultation with the Local Highway Authority and approval of the final PRoW Strategy and Landscape Management Plan by the Local Planning Authority on permanent diversions, and landscaping (as presented within the OLEMS (APP-584) to develop an attractive footpath that walkers can enjoy. Therefore, the residual impact is negligible in the long term and minor adverse before the landscape features mature. Timings of permanent closures and diversions are discussed in section 3.3 of the Outline Public Rights of Way Strategy (APP-581).
010	No provision during and after construction for reducing impact of physical factors. No provision during construction for reducing impact of physical factors arising from scheme including noise, dust, fumes, smells, vibration and artificial lighting. No immediate and permanent provisions after construction for reducing	The Applicant notes the comments made and these matters have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared topic responses on the matters:



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>impact of physical factors arising from scheme including those stated above and electromagnetic field.</p>	<p>Please see Table 13 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p> <p>Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements.</p> <p>Please see Table 10 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding human health.</p>
011	<p>No woodland planting proposed to the north and west of the substation. The plans show woodland planting against the boundary to the south and east, however there is no woodland planting proposed against the other boundaries. Once established, additional planting would screen the substation from the diverted footpath and presumably assist in reducing electromagnetic field.</p>	<p>These matters have been raised in other Relevant Representations and topic responses have been prepared.</p> <p>Please see Table 13 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.</p> <p>The OLEMS (APP-584) show a number of areas of proposed planting to the north and west which are strategically located alongside existing and proposed PRoW. The definitive extent and nature of this planting shall be defined in the Ecological</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		Management Plan and Landscape Management Plan as approved by the Local Planning Authority.
012	In conclusion, there has been a complete lack of transparent engagement with local residents who will be directly and severely prejudiced by the scheme. The East Anglia TWO onshore substation would severely affect Friston and should not in any case be permitted to be developed in such close vicinity.	<p>These matters have been raised in other Relevant Representations and a topic responses has been prepared.</p> <p>Please see Table 1 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding adequacy of consultation.</p>
013	For the above reasons and those set out in SASES and Friston Parish Council's representations, the Planning Inspectorate is invited to reject the application.	<p>The points raised in the SASES Relevant Representation have been considered and are addressed in Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1). The points raised in the Friston Parish Council's Relevant Representation have also been considered and are addressed in Table 3 in Applicant's Comments on Relevant Representations Volume 3 (document reference ExA.RR3.D0.V1).</p>



2.17 Mrs C A Morling (RR-590)

Table 34 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Mrs C A Morling RR-590	38	Temporary Occupation and Use	in respect of right of way

Table 35 Applicant's Comments on Mrs C A Morling's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	Regarding the application for the construction of EA1N I notice from the Environmental Statement of the DCO application that flaws are apparent. Living at Barley Rise, originally named 1 and 2 Crown Farm Cottages, Sizewell, I would like to point out that this property has not been cited as one of the nearest receptors for noise assessment.	<p>An assessment of construction phase noise on residential receptors along the onshore development area is presented within Section 25.6.1.1 (Impact 1) of Chapter 25 Noise and Vibration (APP-073). This assessment was undertaken in accordance with the industry accepted standard for assessing construction noise, BS5228-1:2009+A1:2014 (Code of Practice for Noise and Vibration Control on Construction and Open Sites), which defines the accepted prediction methods and source data for various construction plant and activities.</p> <p>Baseline noise monitoring was undertaken at 23 locations along the onshore cable (4 locations at the landfall site, plus 19 locations along the onshore cable route). The locations selected were agreed with the local planning authority via the Noise and Vibration ETG and represent the nearest noise sensitive receptors (for example, residential properties). Details of these 23 locations are set out within Table 25.3.1 and Table 25.3.4 of Appendix 25.4 Construction Phase Assessment (APP-525). Daytime and night time baseline noise data for the landfall is presented within section 25.3.3 and for the onshore cable route is presented in section 25.3.4.</p> <p>The results presented in Table 25.27 of Chapter 25 Noise and Vibration (APP-073) show that predicted daytime noise levels received at the receptors do not exceed the noise level thresholds where an impact occurs, as defined by the British Standard (BS5228-1:2009+A1:2014), where the embedded mitigation in Table 25.3 is</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>implemented (as outlined below). As such, the assessment concludes there will be no impact on receptors from daytime construction noise along the onshore cable route.</p> <p>Construction phase noise will be controlled through the production of a Construction Phase Noise and Vibration Management Plan post-consent, which is to be submitted to and approved by the local planning authority in advance of construction works commencing, as part of the Code of Construction Practice secured under Requirement 22 of the draft DCO (APP-023). The specific control measures set out within the Construction Phase Noise and Vibration Management Plan will be complied with during the construction phase. Best practice noise mitigation measures, to be implemented and controlled through the Construction Phase Noise and Vibration Management Plan (in relation to the installation of the onshore cable route), will typically include:</p> <ul style="list-style-type: none"> • Management of construction operating hours; • Use of screens and noise barriers / acoustic screens; • Construction site layout to minimise or avoid reversing with use of banksmen where appropriate. Output noise from reversing alarms set at levels for health and safety compliance; • Use of modern, fit for purpose, well maintained plant and equipment to minimise noise generation. Plant and vehicles will be fitted with mufflers /silencers maintained in good working order. Use of silenced equipment, as far as possible and low impact type compressors and generators fitted with lined and sealed acoustic covers. Doors and covers housing noise emitting plant will be kept closed when machines are in use; • No audible music or radios to be played outdoors on site; • Ensuring engines are switched off when machines are idle; and • Regular communication with site neighbours to inform them of the construction schedule, and when noisy activities are likely to occur.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>In addition, jointing bays will not be constructed within 55m of a building used as a dwelling-house in accordance with Requirement 12(15) of the draft DCO (APP-023).</p> <p>The Applicant notes the comments made in relation to noise and these matters have been raised by a number of individual Relevant Representations The Applicant has therefore prepared topic responses on these matters:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p>
002	<p>Our property is affected on all sides by various SPR proposals, I am concerned that the proposed Haul Road, planned to be built in the field next to our property to the east and along with the cable route to the south of our house and used for the entire time of construction will have serious detrimental effects on our health and wellbeing, with light, vibrations, noise and dust from extremely sandy soil</p>	<p>The onshore cable corridor routing has avoided residential titles and gardens (where possible) and minimised disruption to landowners, services, road users and residents generally (see Chapter 4 Site Selection and Assessment of Alternatives (APP-052)).</p> <p>A comprehensive assessment of the impacts on residential properties has been undertaken, considering matters such as air quality, noise and traffic and transport (see Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 74 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>As required by the draft DCO (APP-023) a Code of Construction Practice (CoCP) must be produced by the Applicant and submitted to the relevant planning authority for approval prior to the commencement of construction.</p> <p>The CoCP will provide a key mechanism, enforceable via the Development Consent Order, through which the relevant regulatory authorities can be assured that environmental impacts associated with the construction of the onshore infrastructure will be formally controlled and mitigated. An Outline Code of Construction Practice is provided with the Application (APP-578).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The temporary haul road is required to access a section of the onshore cable route referred to as Section 2 and potentially a short section of Section 3 around Aldeburgh Road (see Figure 6.2a-e - East Anglia TWO (and East Anglia ONE North) Onshore Development Area (APP-097)). It is not used to access the landfall area or onshore substation area. Plate 6.33 presented within Chapter 6 Project Description (APP-054) illustrates an indicative onshore cable route construction sequence. This is illustrated to show potential key work activities, sequences and durations along the onshore cable corridor based on a ducted cable design and shows the periodic nature of the construction activity at Section 2 of the onshore cable corridor.</p>
003	<p>I am concerned about the amount of heavy traffic coming along Lovers Lane to the junction at the northern end of Bridleway 28 which is access to our property. This will have serious safety issues.</p>	<p>Chapter 26 - Traffic and Transport (APP-074) provides an assessment of the traffic and transport effects of the Project. In addition, Appendices 26.1 – 26.26 (APP-527 - APP-552) provide further information on detailed aspects of this assessment.</p> <p>The junction referred to is included as part of Sizewell Gap (Link 12) which also includes Access 1 and Access 2 to the onshore development area. Link 12 was subject to an assessment in accordance with recognised UK guidelines (GEART) and considered the following impacts:</p> <ul style="list-style-type: none"> • Impact 1 – Pedestrian Amenity (section 26.6.1.8.1.7) <ul style="list-style-type: none"> ○ Noting that there are minimal receptors along the link and that pedestrians and cyclists are accommodated off road (i.e. pavement and cycleway), the link is assessed as a low sensitivity. ○ It is considered that a change in background of HGV flows of 132% could result in a medium magnitude of effect on a low sensitivity link resulting in a minor adverse impact. ○ No mitigation further to that embedded within the design of the proposed projects is considered necessary. • Impact 2 – Severance (section 26.6.1.9) <ul style="list-style-type: none"> ○ It can be noted from Table 26.10 that total traffic flows along link 12 (with and without the proposed project's traffic) are significantly below 8,000



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>vehicles per day where the DMRB suggests severance is unlikely to manifest. The magnitude of effect upon these links is therefore assessed as negligible on low to high sensitivity links giving a maximum impact of negligible to minor adverse.</p> <ul style="list-style-type: none"> • Impact 3 – Road Safety (section 26.5.4) <ul style="list-style-type: none"> ○ A review of historic data showed this link to be well below the national average for personal injury collisions and therefore this link was not considered further in line with the agreed methodology. ○ The Outline Access Management Plan (OAMP), Annex 1 (APP-587) details UK standard compliant access treatment for Access 1 and Access 2 which includes the provision of a 40mph speed limit to promote road safety. The design has been validated by an Independent Road safety Audit which is appended to the OAMP. • Impact 4 – Driver Delay (capacity) <ul style="list-style-type: none"> ○ The highway locations sensitive to Driver Delay impacts were identified in consultation with Suffolk County Council and Highways England in the context of the proposed projects' traffic demand as detailed in Chapter 26 - Traffic and Transport , Table 26.25 (APP-074). For Link 12, a forecast increase in total traffic of 10% (for EA1N or EA2) and 12% (EA1N and EA2 cumulative) was presented to highway stakeholders and based on this information, the potential impacts were forecast to be insignificant and it was agreed that no further assessment was necessary. Impact 5 – Driver Delay (highway geometry) ○ Link 12 is an established haul route for Sizewell B so there are no significant highway geometry Driver Delay impacts. <p>In addition to the traffic impacts of the proposed projects', the Applicant has engaged with EDF Energy to consider the cumulative traffic impacts with the proposed Sizewell C Project. EDF Energy has indicated that it does not propose to route construction traffic</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>via Link 12 and therefore there would be no potential for cumulative impacts with Sizewell C.</p> <p>Please see Applicant's responses in Table 31 of Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
004	I am concerned that Bridleway 28 situated immediately next, to the west of our property, which is our access and for part, is our responsibility to maintain, will be used for 'pre-construction vehicles' thereby surrounding us with more disturbance.	Bridleway 28 (PRoW E-363/027/0) located to the west of this property is identified for pre-construction access only and provides access to the onshore development area to undertake onshore preparation works (such as fence erection, archaeological investigations, vegetation clearance etc.). This access will not be used during the construction period.
005	I am concerned that the proposed CCS will be sited fairly close to where we live, in fact in the field at the end of Bridleway 28. This will bring with it additional issues, noise from generators, lighting pollution, constant activity and security issues in this quiet rural area.	<p>A comprehensive assessment of the impacts on residential properties has been undertaken, considering matters such as air quality, noise and traffic and transport (Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 26 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077) from the construction of the onshore infrastructure (including construction consolidation sites).</p> <p>As required by the draft DCO (APP-023) a CoCP must be produced by the Applicant and submitted to the relevant planning authority for approval prior to the commencement of construction.</p> <p>The CoCP will provide a key mechanism, enforceable via the DCO, through which the relevant regulatory authorities can be assured that environmental impacts associated with the construction of the onshore infrastructure will be formally controlled and mitigated. An Outline Code of Construction Practice is provided with the Application (APP-578).</p> <p>The Applicant has looked to address this comment in the responses:</p>



No.	Relevant Representation	Applicant's Comments
		<p>Please see Table 12 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape - cable route.</p> <p>Please see Table 14 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding lighting requirements.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p>
006	Finally, I am concerned that Sizewell Gap Road is the only evacuation route in the event of an emergency at Sizewell Power Station. The result could be utter chaos.	<p>In the draft DCO (AP-023), Requirement 33 requires an Emergency Incident Response Plan. Consultation between the Applicant, SCC and the Office for Nuclear Regulation is on-going around the wording for this requirement.</p> <p>The Applicant has looked to address this comment in these responses:</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
007	More than anything else I am concerned that this property along with us, its owners, seem to have been completely forgotten about and totally disregarded by SPR.	<p>National Policy Statements (NPS) offer specific policy support for the assessment of effects that a project may have on residential receptors. The Environmental Statement has provided appropriate impact assessment on residential receptors in line with the overarching NPS in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5). The potential impact on residential receptors has been considered throughout the development of the Project and this is reflected in the site selection process reported in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). In addition, the potential effects on residential receptors and residents has been further considered and evaluated in other topic specific</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>chapters, including Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 26 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>In terms of consultation, the Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)). A further meeting was held between the Applicant and the respondent on 15th February 2019 during which the proposed use of bridleway 28 (PRoW E-363/027/0) was discussed. The respondent subsequently received notification of acceptance of the applications for examination as required under Section 56 of the Planning Act 2008.</p>



2.18 Natasha Mann (RR-548)

Table 36 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Ashtons Legal on behalf of Natasha Mann RR-548	94, 112	Freehold Purchase	Owner
	89	Temporary Occupation and Use	as assumed owner
	136	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	79	Temporary Occupation and Use	in respect of right of way
	139	Temporary Occupation and Use	in respect of right to use and maintain ditch for the passage of surface water
	84, 144, 145, 146, 147	Temporary Occupation and Use	Owner
	95, 96	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner
	97	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner (in respect of subsoil beneath half width of public highway)
	82, 86	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of way
	83, 85, 92, 93	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

Table 37 Applicant's Comments on Natasha Mann's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	This representation is on behalf of The Mann Family, trading as Manor Farm, Knodishall. The Landowners collectively own and/or occupy land at Manor Farm, Knodishall, Saxmundham.	Noted.
002	The consequence of each DCO is that SPR will be taking some of their land at Manor Farm to accommodate a temporary Haul Road and a temporary works compound, as well as requiring a permanent easement for underground cabling.	<p>The draft DCO (APP-023) describes the authorised development associated this land as follows:</p> <ul style="list-style-type: none"> • Work No. 26 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and cable ducts laid underground from Work No. 23 to Work No. 31 and crossing Snape Road (B1069) together with the construction of a haul road and access and the formation of a new access at Snape Road (B1069); and • Work No. 27 — temporary construction consolidation sites and construction access; <p>In response the Applicant lists out the Plots and rational behind rights being acquired for each the respondent refers to:</p> <ul style="list-style-type: none"> • Plot 79 - A public footpath will be temporarily diverted through this land; • Plots 82, 83, 85 and 93 - Permanent rights to install, maintain and access cables are sought as well as permanent rights of access in order to access the area of permanent ecological mitigation; • Plot 84 - This land will be used temporarily for a CCS to serve construction activities; • Plot 86 - Permanent rights of access are sought; • Plot 89 - Temporary use of the bridleway will be made with non-HGVs for onshore preparation works;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • Plots 92, 95, 96 and 97 - Permanent rights to install, maintain and access cables are sought; • Plot 94 - Rights to acquire this land are sought for permanent ecological mitigation measures; • Plot 112 - Rights to acquire this land are sought to maintain the woodland and for planting and bunding works for landscaping and the maintenance of the landscaping, to install a Sustainable Drainage System and associated pipes to connect into the local drainage network, and to divert and create new public footpaths; and • Plots 136 and 139, 144, 145, 146 and 147 - The land will be used temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access.
003	<p>The Landowners do not object to the principle of the provision of additional off shore wind farm capacity in the North Sea but object to the taking and use of their land on the grounds that it has not been demonstrated that the public interest outweighs the impact on their holding.</p>	<p>As presented in the Statement of Reasons (APP-026), a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one only if the Secretary of State is satisfied that:</p> <ul style="list-style-type: none"> • The land is required for the development to which the development consent relates; • The land is required to facilitate or is incidental to that development; or • The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The landowner's land is required for the development to which the consent relates as it is required to install, operate and maintain the cables and for a compound required to facilitate the development.</p> <p>It is also necessary for the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Over-arching policy drivers and need for the project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p> <p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018³⁶) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify. In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017³⁷) sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increased offshore wind capacity to 30GW by 2030, which represents an increase from the approximately 8GW currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030.</p>

³⁶ Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1.pdf [Accessed 21/05/2019].

³⁷ Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2019].



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The East Anglia TWO and East Anglia ONE North projects will have a generating capacity estimated at 900 Mega Watts (MW³⁸) and 800 Mega Watts (MW³⁹) respectively and have the potential to make a substantial contribution to UK 2030 energy targets by meeting approximately 2.25⁴⁰% and 2⁴¹% respectively of the UK offshore wind cumulative deployment target for 2030 (section 5.1.7 of the Development Consent and Planning Statement).</p> <p>Moreover, the East Anglia TWO and East Anglia ONE North projects would have a direct positive impact by securing renewable energy supply for the equivalent of approximately 800,000⁴² and 710,000⁴³ UK households respectively. The Projects would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Projects.⁴⁴</p>

³⁸ As measured at point of connection of the onshore cables to the onshore substation.

³⁹ As measured at point of connection of the onshore cables to the onshore substation

⁴⁰ Based on 900MW / 40,000MW x 100

⁴¹ Based on 800MW / 40,000MW x 100

⁴² Calculated taking the number of megawatts (900) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 800,416 homes

⁴³ Calculated taking the number of megawatts (800) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 710,945 homes

⁴⁴ Page 27 of UK Government Offshore Wind Sector Deal

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
004	The DCO provides for taking an important part of their landholding and the impact on their business will be so severe that an alternative route for the haul road, compound and cabling corridor must be found.	<p>The Compulsory Acquisition Guidance details some general considerations for the justification of compulsory acquisition powers within a DCO. An applicant for compulsory acquisition powers should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored. In relation to the representation on the location of the onshore cable route, this is a matter that was given careful consideration at the site selection stage and has also been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>In relation to the comment on the location of the haul road and Construction Consolidation Site (CCS), Chapter 26 Traffic and Transport (APP-074) presents a comprehensive traffic and transport impact assessment, part of which has assessed the suitability of various routes to the onshore development area. Heavy Goods Vehicles (HGV) will access the onshore development area via defined routes set out in Chapter 26 Traffic and Transport (APP-074), all of which are Strategic Lorry Routes or Zone distributor routes which is compliant with the route hierarchy for the whole of Suffolk which has been developed by Suffolk County Council to encourage HGV drivers to use the most appropriate route according to their destination.</p> <p>Access to the onshore substation and National Grid substation during construction is off the B1069 (Snape Road), which forms part of the Suffolk County Council's Zone distributor routes for HGVs. Considering the routing of the onshore cable corridor and the classification of the B1069 (Snape Road) as a zone distributor routes, it is appropriate to establish the onshore cable route and substation construction haul road from Snape Road. By combining access of for the onshore cable route and the onshore substation/National Grid substation it avoids the need for a second temporary access to be established to serve the onshore substation/National Grid substation. There is a need to establish CCSs close to the public road in order to minimise travel distances of road based vehicles along the</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>temporary haul roads where practicable. This allows road based delivery vehicles to make larger deliveries to a CCS, where they deliveries would be broken down and dispatched to the work area on smaller vehicles, typically along the temporary haul roads, thereby removing vehicle movements from the public road.</p> <p>The routeing of the onshore cable corridor, as described in Table 5 of Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1), has by definition also generated the routeing of the onshore cable route and substation construction haul road route. Key onshore cable route selection principles adopted for the onshore cable corridor apply equally to the routeing of the onshore cable route and substation construction haul road route, namely:</p> <ul style="list-style-type: none"> • Avoid residential titles (including whole garden) where possible; • Avoid direct significant impacts to internationally and nationally designated areas (e.g. SACs, SPAs, and SSSIs etc.) where possible; • Minimise significant impacts to the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty; • Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction; • Minimise interaction with mature woodland; • Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting risk associated with interfering with another DCO proposal (statutory undertaker); • The onshore cable corridor / route (and therefore consideration of substation and landfall siting) should be kept as straight and as short as practicable;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

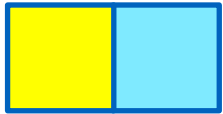
No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Minimise the number and length of trenchless techniques such as horizontal direction drills (HDDs) (see Chapter 6 Project Description (APP-054)); Minimise the number of crossings of assets (e.g. utilities) (assessed on a case-by-case basis); and All other policy and environmental constraints have been considered on a case-by-case basis (with consideration of appropriate mitigation). <p>The positioning of a CCS at Work No. 27 ensures the CCS is located within a single field, is close to the B1069, is a sufficient distance from residential properties to minimise impacts and is strategically placed to service both the onshore cable corridor and the onshore substation/National Grid substation.</p> <p>The permanent rights sought are to install onshore cables, together with a right of access to the cables for maintenance as described above. Once the cables are installed and the land has been reinstated, normal agricultural operations and recommence.</p> <p>The land that will be used temporarily for the CCS and the haul road are to serve construction activities. Once the construction is completed and the land has been reinstated, normal agricultural operations and recommence.</p>
005	Without prejudice to the foregoing, SPR has failed to provide the Landowners with sufficient information, including in particular, as to likely timings for entry, field and other surface water run-off, drainage arrangements, depths of cables, capacity for continued capacity for use for the Landowners' business, soil management during and after construction, and remedial works. This represents a failure to consult properly with and work with the owners of land affected by each DCO proposal.	<p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to so.</p> <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners, occupiers and representatives to continue to communicate likely timings of construction and proposed entry dates giving as much notice as practical.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>There is a commitment to produce a Surface Water and Drainage Management Plan as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan is will be made available when it is possible to do so.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to pre and post construction drainage strategies and works. As described in the Chapter 6 Project Description (APP-054) the onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural activities over the cables. In Chapter 21 Land Use (APP-069) it advises that the operational phase impacts to agricultural land arising from the operation of the landfall and onshore cable routes are limited to the narrow strip of land above the onshore cables over which the Applicant is likely to acquire cable protection rights. The Applicant will seek to ensure as far as possible that agricultural activities along the onshore cable route can continue during the operational period (section 21.6.2.1.1).</p> <p>The Applicant has committed to undertaking discussions with landowners regarding potential future land uses and any restrictions on these as part of ongoing discussions between landowners and the Applicant.</p> <p>There is a commitment to produce a Soil Management Plan is made in the Outline Code of Construction Plan (APP-578) submitted as part of the Application. The Soil Management Plan will be made available when it is possible to do so.</p> <p>In the Outline Code of Construction Practice (APP-578) it confirms that the restoration of land will be carried out. Any land used temporarily for construction is to be reinstated to its former condition, or such condition as the Local Planning Authority may approve. Reinstatement associated with roads will be undertaken in</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>consultation with the local highway authority where relevant. All reinstatement will be undertaken as soon as reasonably practical and within twelve months of completion of the relevant stage of the onshore works or such other period as agreed with the Local Planning Authority.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the reinstatement and remedial works.</p>



2.19 Peter Mann (RR-549)

Table 38 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Ashtons Legal on behalf of Peter Mann RR-549	94, 112	Freehold Purchase	Owner
	89	Temporary Occupation and Use	as assumed owner
	136	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	79, 145, 146, 147	Temporary Occupation and Use	in respect of right of way
	139	Temporary Occupation and Use	in respect of right to use and maintain ditch for the passage of surface water
	144	Temporary Occupation and Use	Owner
	95, 96	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner
	97	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner (in respect of subsoil beneath half width of public highway)
	82, 86	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of way
	92, 93	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

Table 39 Applicant's Comments on Peter Mann's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	These representations are on behalf of the Mann Family trading as Manor Farm, Knodishall. The Landowners collectively own and/or occupy land at Manor Farm, Knodishall, Saxmundham.	Noted.
002	The consequence of each DCO is that SPR will be taking some of their land at Manor Farm to accommodate a temporary Haul Road and a temporary works compound, as well as requiring a permanent easement for underground cabling.	<p>The draft DCO (APP-023) describes the authorised development associated this land as follows:</p> <ul style="list-style-type: none"> • Work No. 26 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and cable ducts laid underground from Work No. 23 to Work No. 31 and crossing Snape Road (B1069) together with the construction of a haul road and access and the formation of a new access at Snape Road (B1069); and • Work No. 27 — temporary construction consolidation sites and construction access; <p>In response the Applicant lists out the Plots and rational behind rights being acquired for each the respondent refers to:</p> <ul style="list-style-type: none"> • Plot 79 - A public footpath will be temporarily diverted through this land; • Plots 82 and 93 - Permanent rights to install, maintain and access cables are sought as well as permanent rights of access in order to access the area of permanent ecological mitigation; • Plot 86 - Permanent rights of access are sought; • Plot 89 - Temporary use of the bridleway will be made with non-HGVs for onshore preparation works; • Plots 92, 95, 96 and 97 - Permanent rights to install, maintain and access cables are sought;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Plot 94 - Rights to acquire this land are sought for permanent ecological mitigation measures; Plot 112 - Rights to acquire this land are sought to maintain the woodland and for planting and bunding works for landscaping and the maintenance of the landscaping, to install a Sustainable Drainage System and associated pipes to connect into the local drainage network, and to divert and create new public footpaths; and Plots 136 and 139, 144, 145, 146 and 147 - The land will be used temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access.
003	<p>The Landowners do not object to the principle of the provision of additional off shore wind farm capacity in the North Sea but object to the taking and use of their land on the grounds that it has not been demonstrated that the public interest outweighs the impact on their holding.</p>	<p>As presented in the Statement of Reasons (APP-026), a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one only if the Secretary of State is satisfied that:</p> <ul style="list-style-type: none"> The land is required for the development to which the development consent relates; The land is required to facilitate or is incidental to that development; or The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The landowner's land is required for the development to which the consent relates as it is required to install, operate and maintain the cables and for a compound required to facilitate the development.</p> <p>It is also necessary for the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily.</p> <p>Over-arching policy drivers and need for the project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> • Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018⁴⁵) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify. • In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017⁴⁶) sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increased offshore wind capacity to 30GW by 2030, which represents an increase from the approximately 8GW currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030.</p> <p>The East Anglia TWO and East Anglia ONE North projects will have a generating capacity estimated at 900 Mega Watts (MW⁴⁷) and 800 Mega Watts (MW⁴⁸) respectively and have the potential to make a substantial contribution to UK 2030</p>

⁴⁵ Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1.pdf [Accessed 21/05/2019].

⁴⁶ Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2019].

⁴⁷ As measured at point of connection of the onshore cables to the onshore substation.

⁴⁸ As measured at point of connection of the onshore cables to the onshore substation



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>energy targets by meeting approximately 2.25⁴⁹% and 2⁵⁰% respectively of the UK offshore wind cumulative deployment target for 2030 (section 5.1.7 of the Development Consent and Planning Statement).</p> <p>Moreover, the East Anglia TWO and East Anglia ONE North projects would have a direct positive impact by securing renewable energy supply for the equivalent of approximately 800,000⁵¹ and 710,000⁵² UK households respectively. The Projects would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Projects.⁵³</p>
004	The DCO provides for taking an important part of their landholding and the impact on their business will be so severe that an alternative route for the haul road, compound and cabling corridor must be found.	The Compulsory Acquisition Guidance details some general considerations for the justification of compulsory acquisition powers within a DCO. An applicant for compulsory acquisition powers should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored. In relation to the representation on the location of the onshore cable route, this is a matter that was given careful consideration at the site selection stage and has also been raised by a

⁴⁹ Based on 900MW / 40,000MW x 100

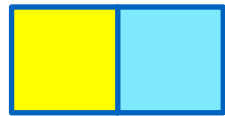
⁵⁰ Based on 800MW / 40,000MW x 100

⁵¹ Calculated taking the number of megawatts (900) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 800,416 homes

⁵² Calculated taking the number of megawatts (800) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 710,945 homes

⁵³ Page 27 of UK Government Offshore Wind Sector Deal

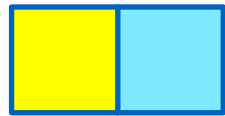
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>In relation to the comment on the location of the haul road and Construction Consolidation Site (CCS), Chapter 26 Traffic and Transport (APP-074) presents a comprehensive traffic and transport impact assessment, part of which has assessed the suitability of various routes to the onshore development area. Heavy Goods Vehicles (HGV) will access the onshore development area via defined routes set out in Chapter 26 Traffic and Transport (APP-074), all of which are Strategic Lorry Routes or Zone distributor routes which is compliant with the route hierarchy for the whole of Suffolk which has been developed by Suffolk County Council to encourage HGV drivers to use the most appropriate route according to their destination.</p> <p>Access to the onshore substation and National Grid substation during construction is off the B1069 (Snape Road), which forms part of the Suffolk County Council's Zone distributor routes for HGVs. Considering the routing of the onshore cable corridor and the classification of the B1069 (Snape Road) as a zone distributor routes, it is appropriate to establish the onshore cable route and substation construction haul road from Snape Road. By combining access of for the onshore cable route and the onshore substation/National Grid substation it avoids the need for a second temporary access to be established to serve the onshore substation/National Grid substation. There is a need to establish CCSs close to the public road in order to minimise travel distances of road based vehicles along the temporary haul roads where practicable. This allows road based delivery vehicles to make larger deliveries to a CCS, where they deliveries would be broken down and dispatched to the work area on smaller vehicles, typically along the temporary haul roads, thereby removing vehicle movements from the public road.</p> <p>The routeing of the onshore cable corridor, as described in Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

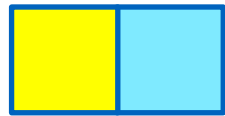
No.	Relevant Representation	Applicant's Comments
		<p>ExA.RR2.D0.V1), has by definition also generated the routeing of the onshore cable route and substation construction haul road route. Key onshore cable route selection principles adopted for the onshore cable corridor apply equally to the routeing of the onshore cable route and substation construction haul road route, namely:</p> <ul style="list-style-type: none"> • Avoid residential titles (including whole garden) where possible; • Avoid direct significant impacts to internationally and nationally designated areas (e.g. SACs, SPAs, and SSSIs etc.) where possible; • Minimise significant impacts to the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty; • Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction; • Minimise interaction with mature woodland; • Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting risk associated with interfering with another DCO proposal (statutory undertaker); • The onshore cable corridor / route (and therefore consideration of substation and landfall siting) should be kept as straight and as short as practicable; • Minimise the number and length of trenchless techniques such as horizontal direction drills (HDDs) (see Chapter 6 Project Description (APP-054)); • Minimise the number of crossings of assets (e.g. utilities) (assessed on a case-by-case basis); and • All other policy and environmental constraints have been considered on a case-by-case basis (with consideration of appropriate mitigation). <p>The positioning of a CCS at Work No. 27 ensures the CCS is located within a single field, is close to the B1069, is a sufficient distance from residential properties to</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>minimise impacts and is strategically placed to service both the onshore cable corridor and the onshore substation/National Grid substation.</p> <p>The permanent rights sought are to install onshore cables, together with a right of access to the cables for maintenance as described above. Once the cables are installed and the land has been reinstated, normal agricultural operations and recommence.</p> <p>The land that will be used temporarily for the CCS and the haul road are to serve construction activities. Once the construction is completed and the land has been reinstated, normal agricultural operations and recommence.</p>
005	<p>Without prejudice to the foregoing, SPR has failed to provide the Landowners with sufficient information, including in particular, as to likely timings for entry, field and other surface water run-off, drainage arrangements, depths of cables, capacity for continued capacity for use for the Landowners' business, soil management during and after construction, and remedial works. This represents a failure to consult properly with and work with the owners of land affected by each DCO proposal.</p>	<p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to so.</p> <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners, occupiers and representatives to continue to communicate likely timings of construction and proposed entry dates giving as much notice as practical.</p> <p>There is a commitment to produce a Surface Water and Drainage Management Plan as part of the Outline Code of Construction Practice (APP-578 submitted as part of the Application. The Surface Water and Drainage Management Plan will be made available when it is possible to do so.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to pre and post construction drainage strategies and works. As described in the Chapter 6 Project Description (APP-054) the onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural activities over the cables. In Chapter 21 Land Use (APP-069) it advises that the operational phase impacts to agricultural land arising from the operation of the landfall and onshore cable routes are limited to the narrow strip of land above the onshore cables over which the Applicant is likely to acquire cable protection rights. The Applicant will seek to ensure as far as possible that agricultural activities along the onshore cable route can continue during the operational period (section 21.6.2.1.1).</p> <p>The Applicant has committed to undertaking discussions with landowners regarding potential future land uses and any restrictions on these as part of ongoing discussions between landowners and the Applicant.</p> <p>There is a commitment to produce a Soil Management Plan is made in the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Soil Management Plan will be made available when it is possible to do so.</p> <p>In the Outline Code of Construction Practice (APP-578) confirms that restoration of land will be carried out. Any land used temporarily for construction is to be reinstated to its former condition, or such condition as the Local Planning Authority may approve. Reinstatement associated with roads will be undertaken in consultation with the local highway authority where relevant. All reinstatement will be undertaken as soon as reasonably practical and within twelve months of completion of the relevant stage of the onshore works or such other period as agreed with the Local Planning Authority.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the reinstatement and remedial works.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.20 Richard Mann (RR-550)

Table 40 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Ashtons Legal on behalf of Richard Mann RR-550	94, 112	Freehold Purchase	Owner
	89	Temporary Occupation and Use	as assumed owner
	136	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	79	Temporary Occupation and Use	in respect of right of way
	139	Temporary Occupation and Use	in respect of right to use and maintain ditch for the passage of surface water
	84, 144, 145, 146, 147	Temporary Occupation and Use	Owner
	95, 96	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner
	97	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner (in respect of subsoil beneath half width of public highway)
	82, 86	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of way
	83, 85, 92, 93	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

Table 41 Applicant's Comments on Richard Mann's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	This representation is on behalf of The Mann Family, trading as Manor Farm, Knodishall. The Landowners collectively own and/or occupy land at Manor Farm, Knodishall, Saxmundham.	Noted.
002	The consequence of each DCO is that SPR will be taking some of their land at Manor Farm to accommodate a temporary Haul Road and a temporary works compound, as well as requiring a permanent easement for underground cabling.	<p>The draft DCO (APP-023) describes the authorised development associated this land as follows:</p> <ul style="list-style-type: none"> • Work No. 26 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and cable ducts laid underground from Work No. 23 to Work No. 31 and crossing Snape Road (B1069) together with the construction of a haul road and access and the formation of a new access at Snape Road (B1069); and • Work No. 27 — temporary construction consolidation sites and construction access; <p>In response the Applicant lists out the Plots and rational behind rights being acquired for each the respondent refers to:</p> <ul style="list-style-type: none"> • Plot 79 - A public footpath will be temporarily diverted through this land; • Plots 82, 83, 85 and 93 - Permanent rights to install, maintain and access cables are sought as well as permanent rights of access in order to access the area of permanent ecological mitigation; • Plot 84 - This land will be used temporarily for a CCS to serve construction activities; • Plot 86 - Permanent rights of access are sought; • Plot 89 - Temporary use of the bridleway will be made with non-HGVs for onshore preparation works;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Plots 92, 95, 96 and 97 - Permanent rights to install, maintain and access cables are sought; Plot 94 - Rights to acquire this land are sought for permanent ecological mitigation measures; Plot 112 - Rights to acquire this land are sought to maintain the woodland and for planting and bunding works for landscaping and the maintenance of the landscaping, to install a Sustainable Drainage System and associated pipes to connect into the local drainage network, and to divert and create new public footpaths; and Plots 136 and 139, 144, 145, 146 and 147 - The land will be used temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access.
003	<p>The Landowners do not object to the principle of the provision of additional off shore wind farm capacity in the North Sea but object to the taking and use of their land on the grounds that it has not been demonstrated that the public interest outweighs the impact on their holding.</p>	<p>As presented in the Statement of Reasons (APP-026), a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one only if the Secretary of State is satisfied that:</p> <ul style="list-style-type: none"> The land is required for the development to which the development consent relates; The land is required to facilitate or is incidental to that development; or The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The landowner's land is required for the development to which the consent relates as it is required to install, operate and maintain the cables and for a compound required to facilitate the development.</p> <p>It is also necessary for the Secretary of State to be satisfied that there is a compelling case in the public interest for the land to be acquired compulsorily.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Over-arching policy drivers and need for the project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p> <p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> • Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018⁵⁴) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify. • In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017⁵⁵) sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increased offshore wind capacity to 30GW by 2030, which represents an increase from the approximately 8GW currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030.</p>

⁵⁴ Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1.pdf [Accessed 21/05/2019].

⁵⁵ Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2019].



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>The East Anglia TWO and East Anglia ONE North projects will have a generating capacity estimated at 900 Mega Watts (MW⁵⁶) and 800 Mega Watts (MW⁵⁷) respectively and have the potential to make a substantial contribution to UK 2030 energy targets by meeting approximately 2.25⁵⁸% and 2⁵⁹% respectively of the UK offshore wind cumulative deployment target for 2030 (section 5.1.7 of the Development Consent and Planning Statement).</p> <p>Moreover, the East Anglia TWO and East Anglia ONE North projects would have a direct positive impact by securing renewable energy supply for the equivalent of approximately 800,000⁶⁰ and 710,000⁶¹ UK households respectively. The Projects would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Projects.⁶²</p>

⁵⁶ As measured at point of connection of the onshore cables to the onshore substation.

⁵⁷ As measured at point of connection of the onshore cables to the onshore substation

⁵⁸ Based on 900MW / 40,000MW x 100

⁵⁹ Based on 800MW / 40,000MW x 100

⁶⁰ Calculated taking the number of megawatts (900) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 800,416 homes

⁶¹ Calculated taking the number of megawatts (800) multiplied by the number of hours in one year (8,766), multiplied by the average load factor for offshore wind (38.36 %, published by the Digest of United Kingdom Energy Statistics), divided by the average annual household energy consumption (3.781MWh kilo Watt hours (kWh)), giving an equivalent of powering 710,945 homes

⁶² Page 27 of UK Government Offshore Wind Sector Deal

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
004	The DCO provides for taking an important part of their landholding and the impact on their business will be so severe that an alternative route for the haul road, compound and cabling corridor must be found.	<p>The Compulsory Acquisition Guidance details some general considerations for the justification of compulsory acquisition powers within a DCO. An applicant for compulsory acquisition powers should be able to demonstrate that all reasonable alternatives to compulsory acquisition have been explored. In relation to the representation on the location of the onshore cable route, this is a matter that was given careful consideration at the site selection stage and has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>In relation to the comment on the location of the haul road and Construction Consolidation Site (CCS), Chapter 26 Traffic and Transport (APP-074) presents a comprehensive traffic and transport impact assessment, part of which has assessed the suitability of various routes to the onshore development area. Heavy Goods Vehicles (HGV) will access the onshore development area via defined routes set out in Chapter 26 Traffic and Transport (APP-074), all of which are Strategic Lorry Routes or Zone distributor routes which is compliant with the route hierarchy for the whole of Suffolk which has been developed by Suffolk County Council to encourage HGV drivers to use the most appropriate route according to their destination.</p> <p>Access to the onshore substation and National Grid substation during construction is off the B1069 (Snape Road), which forms part of the Suffolk County Council's Zone distributor routes for HGVs. Considering the routing of the onshore cable corridor and the classification of the B1069 (Snape Road) as a zone distributor routes, it is appropriate to establish the onshore cable route and substation construction haul road from Snape Road. By combining access of for the onshore cable route and the onshore substation/National Grid substation it avoids the need for a second temporary access to be established to serve the onshore substation/National Grid substation. There is a need to establish CCSs close to the public road in order to minimise travel distances of road based vehicles along the</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>temporary haul roads where practicable. This allows road based delivery vehicles to make larger deliveries to a CCS, where they deliveries would be broken down and dispatched to the work area on smaller vehicles, typically along the temporary haul roads, thereby removing vehicle movements from the public road.</p> <p>The routeing of the onshore cable corridor, as described in Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1), has by definition also generated the routeing of the onshore cable route and substation construction haul road route. Key onshore cable route selection principles adopted for the onshore cable corridor apply equally to the routeing of the onshore cable route and substation construction haul road route, namely:</p> <ul style="list-style-type: none"> • Avoid residential titles (including whole garden) where possible; • Avoid direct significant impacts to internationally and nationally designated areas (e.g. SACs, SPAs, and SSSIs etc.) where possible; • Minimise significant impacts to the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty; • Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction; • Minimise interaction with mature woodland; • Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting risk associated with interfering with another DCO proposal (statutory undertaker); • The onshore cable corridor / route (and therefore consideration of substation and landfall siting) should be kept as straight and as short as practicable;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

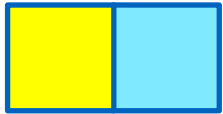
No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Minimise the number and length of trenchless techniques such as horizontal direction drills (HDDs) (see Chapter 6 Project Description (APP-054)); Minimise the number of crossings of assets (e.g. utilities) (assessed on a case-by-case basis); and All other policy and environmental constraints have been considered on a case-by-case basis (with consideration of appropriate mitigation). <p>The positioning of a CCS at Work No. 27 ensures the CCS is located within a single field, is close to the B1069, is a sufficient distance from residential properties to minimise impacts and is strategically placed to service both the onshore cable corridor and the onshore substation/National Grid substation.</p> <p>The permanent rights sought are to install onshore cables, together with a right of access to the cables for maintenance as described above. Once the cables are installed and the land has been reinstated, normal agricultural operations and recommence.</p> <p>The land that will be used temporarily for the CCS and the haul road are to serve construction activities. Once the construction is completed and the land has been reinstated, normal agricultural operations and recommence.</p>
005	Without prejudice to the foregoing, SPR has failed to provide the Landowners with sufficient information, including in particular, as to likely timings for entry, field and other surface water run-off, drainage arrangements, depths of cables, capacity for continued capacity for use for the Landowners' business, soil management during and after construction, and remedial works. This represents a failure to consult properly with and work with the owners of land affected by each DCO proposal.	<p>The Applicant has provided requested information when and where possible. The Applicant will continue to work constructively with landowners, occupiers and their representatives to provide information when and where it is available to so.</p> <p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners, occupiers and representatives to continue to communicate likely timings of construction and proposed entry dates giving as much notice as practical.</p> <p>There is a commitment to produce a Surface Water and Drainage Management Plan as part of the Outline Code of Construction Practice (APP-578) submitted</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>as part of the Application. The Surface Water and Drainage Management Plan will be made available when it is possible to do so.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to pre and post construction drainage strategies and works. As described in the Chapter 6 Project Description (APP-054) the onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural activities over the cables. In Chapter 21 Land Use (APP-069) it advises that the operational phase impacts to agricultural land arising from the operation of the landfall and onshore cable routes are limited to the narrow strip of land above the onshore cables over which the Applicant is likely to acquire cable protection rights. The Applicant will seek to ensure as far as possible that agricultural activities along the onshore cable route can continue during the operational period (section 21.6.2.1.1).</p> <p>The Applicant has committed to undertaking discussions with landowners regarding potential future land uses and any restrictions on these as part of ongoing discussions between landowners and the Applicant.</p> <p>There is a commitment to produce a Soil Management Plan is made in the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Soil Management Plan will be made available when it is possible to do so. The Outline Code of Construction Practice (APP-578) confirms that the restoration of land will be carried out. Any land used temporarily for construction is to be reinstated to its former condition, or such condition as the Local Planning Authority may approve. Reinstatement associated with roads will be undertaken in consultation with the local highway authority where relevant. All reinstatement will be undertaken as soon as reasonably practical and within twelve months of</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>completion of the relevant stage of the onshore works or such other period as agreed with the Local Planning Authority.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the reinstatement and remedial works.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.21 Simon Newberry (RR-603)

Table 42 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Simon Newberry RR-603	136	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	134	Temporary Occupation and Use	Owner

Table 43 Applicant's Comments on Simon Newberry's Relevant Representation

No	Relevant Representation	Applicant's Comments
001	<p>My name is Dr Simon Newberry, and I am the freeholder, along with my wife, (Redacted).</p> <p>I am an engineer with PhD in geotechnical engineering and I run my business, Newberry Engineering and Consultancy Limited, which is registered at the above address. I have worked on numerous projects, including electricity substations, and I have a deep knowledge and understanding of the impacts both of the construction and operation of an electricity substation.</p> <p>In this region, I was the project manager on the Galloper substation at Sizewell. I have an MSc in material engineering and I sit on the IET Board for writing BS7671 UK electrical regulations. I am a qualified site manager, holding SMSTS and have represented the UK through the international electro-technical committee. I have been an advisor to numerous international electrical accreditation</p>	Noted.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	boards, including Underwriters Limited (USA), VDE (German equivalent of British Standards), CSTB (French equivalent of British building standards amongst others.	
002	<p>Lack of clarity of proposals/failure to consult:</p> <p>From the start of this process, Scottish power has been very unclear as to exactly what their proposals are likely to be. Initial consultations suggested that the Friston site was only one of 7 sites which was under consideration and so on detailed enquiry Scottish Power reassured us that this site was not top of their list and so there was little engagement on the details as to how it would affect us. After the site was definitively chosen the Scottish Power representative visited the site and informed us that the company did not need to purchase our site as they would not be using it for any of the scheme, and that we would only be compensated for noise, dust and disruption. However, no concrete proposals were advanced.</p>	<p>Comments relating to the clarity around the Applicant's proposals and subsequent failure to consult are addressed in relation to specific points below. However, in response to the specific point made by the respondent in relation to the location of the onshore substation, the onshore substation site selection process has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter. Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p> <p>In relation to the specific proposals for the land to which the respondent is referring, the Applicant can confirm that subject to detailed design and further investigatory works by National Grid the following works are proposed.</p> <p>The existing 400kV angle tower (Ref.4ZX19) located to the west of the Respondent's property is proposed to be retained as part of the OHL works, with the diverted OHL spans to the west re-connecting to this existing tower. The feasibility design has been developed to ensure the proposed new angle of deviation is within the original tower design to limit the extent of works required at this tower (e.g. avoid replacement). Subject to the final route alignment, tower strengthening and modifications to maintain electrical safety clearances may be necessary.</p> <p>Land in Plot 134 between 4ZX019 and 4ZX018 may be required for setting up machine/pulling sites in order to string conductors.</p>
003	Insufficient consultation on concrete plans/failure to consult:	The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29 th January 2019 as shown in the Consultation



No	Relevant Representation	Applicant's Comments
	<p>It was not until 22nd October 2019, almost two years after the initial public consultations and moments before the application was submitted, that Scottish Power indicated to us that areas of our property were to be included in the DCO boundary on a temporary basis. At no stage prior to this had they indicated this was likely, in fact the opposite was the case. The plan attached to that letter includes the whole of our property, apart from the house, including access, our private gardens, the entire camping facilities, land for animals, fruit and agriculture and our outbuildings. This would render our business unviable and it is entirely unclear how we would be expected to live in the property whilst these works are being carried out. We have still been given no indication of time periods, dates for entry and exit and what the land would be used for. In this letter the applicant is still stating that they don't know and won't know how disruptive this will be until detailed design is carried out at a date in the future which has not been specified. This is wholly unacceptable, as it has a material impact on our ability to run our businesses from the site, or to develop our business further.</p>	<p>Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p> <p>Further correspondence specifically referred to by the respondent comprised a letter dated 22nd October 2019 setting out the reason for the inclusion of the respondent's property in the Order Land.</p> <p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains that the Project is based on a project design envelope (or 'Rochdale Envelope') approach. This involves definition of a range of parameters that enables the assessment of each impact to be conducted based on design parameters likely to result in the maximum adverse effect (i.e. the worst case scenario). It is recognised by the Planning Inspectorate Advice Note Nine that, at the time of submitting an application, offshore wind developers may not know the precise nature and arrangement of infrastructure and associated infrastructure that make up the proposed development. The Rochdale Envelope approach provides flexibility that is important to the Project as it prevents consent being granted for specific infrastructure or a particular layout which is not optimal or efficient at the time of construction.</p> <p>The Applicant notes the comment made with regards to consultation, tourism, and hospitality and these topics have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p>
004	<p>Furthermore, should the proposals go ahead, it is extremely unlikely that we could continue to run our business and deprive income from the same given the proximity of a large industrial complex which will be fully visible and have sufficient noise and light pollution to</p>	<p>The Applicant notes the comment made with regards to consultation, tourism, and hospitality and these topics have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on the matter:</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	mean it is incompatible both with family life and a tourism business. This has been a process which has been extremely stressful for both of us, particularly because of the lack of information, lack of process or engagement from the company and most recently the implication that this is not something for which the company itself feel responsible but has sub contracted to NGET. We have no interaction with NGET.	Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.
005	<p>Lack of engagement even after request for further information:</p> <p>Even now they are not being clear to us what exactly or how exactly we will be affected by the construction or operation of the site as Scottish Power, as applicant has wholly failed to consult us adequately or properly in respect of their plans for their proposed site. We have tried to engage with the company and its agents on numerous occasions and they have been extremely obtuse as to what their plans are and how they will affect us, despite our contacting them and asking for more information.</p>	<p>The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p> <p>Further correspondence specifically referred to by the respondent comprised a letter dated 22nd October 2019 setting out the reason for the inclusion of the respondent's property in the Order Land.</p>
006	<p>Failure to discharge duty to consult:</p> <p>The applicant has a duty pursuant to s42 of the Planning Act 2008 to consult</p> <p>(a) such persons as are prescribed and</p> <p>(d) each person who is within one or more of the categories in s44.</p> <p>In particular, under s44 it is required to consult any person who if the Order were to be implemented would become</p>	<p>The Applicant confirms that the respondent was consulted pursuant to s.42 of the Planning Act 2008 (letter dated 29th January 2019 as shown in the Consultation Report - Appendix 10.10 - Landowner and Statutory Undertaker Consultation (APP-040)).</p> <p>Further correspondence specifically referred to by the respondent comprised a letter dated 22nd October 2019 setting out the reason for the inclusion of the respondent's property in the Order Land.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	entitled to make relevant claims. Given the proximity of our land to the proposed site and the inclusion of our land within the boundary of SPR's proposed Development Consent Order application we understand that we would be entitled to make claims under both section 10 of the Compulsory Purchase Act 1965 and claims under Part 1 of the Land Compensation Act 1973. We are also entitled to be consulted pursuant to s47 of the Planning Act 2008 by reason of being a person living within the vicinity of the development land.	
007	<p>Failure to discharge higher duty in respect of those with land within the DCO boundary:</p> <p>The intention of the 2008 Planning Act was to ensure that the applicant is required to carry out adequate consultation. It is a principle of law set out in <i>R(Moseley) v London Borough of Haringey</i> that the degree of specificity with which, in fairness, an authority should conduct its consultation exercise may be influenced by the identity of those whom it is consulting. The case clearly sets out that the demands of fairness are somewhat higher when an authority contemplates depriving someone of an existing benefit or advantage. Failure to consult/obfuscation: Very disappointingly, Scottish Power seem to have reached the erroneous conclusion that they do not need to properly consult us on their plans. At every turn they have sought to obfuscate what they are intending to do and the consequences on us. They have not indicated to us that they wish to use our land but have sought to use some existing powers which National Grid have to enter on to our land to maintain their existing overhead lines. As a result, Scottish Power have not fully consulted us at all.</p>	<p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains that the Project is based on a project design envelope (or 'Rochdale Envelope') approach. This involves definition of a range of parameters that enables the assessment of each impact to be conducted based on design parameters likely to result in the maximum adverse effect (i.e. the worst case scenario). It is recognised by the Planning Inspectorate Advice Note Nine that, at the time of submitting an application, offshore wind developers may not know the precise nature and arrangement of infrastructure and associated infrastructure that make up the proposed development. The Rochdale Envelope approach provides flexibility that is important to the Project as it prevents consent being granted for specific infrastructure or a particular layout which is not optimal or efficient at the time of construction.</p> <p>National Grid's rights for existing assets on this land are within a Deed of Grant dated 10th February 1966 (T. Bowman esq. – CEGB). This gives Full Rights and Liberty for entry onto the property at all reasonable times with or without vehicles, plant and equipment to retain, use, maintain, repair, renew, inspect and remove either of the electric lines. The Deed also permits the grantee, at its expense and in a proper and woodman like manner to fell or lop all trees and coppice wood on the property that, if not felled or lopped, would obstruct or interfere the working of the electric lines.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	Reading the lease, it is very clear to us that this lease is wholly inadequate for the purposes of carrying out a substantial new development and we find it extraordinary that Scottish Power and National Grid should seek to deprive us of the quiet enjoyment of our land without paying us any compensation whatsoever or consulting us as to their plans. We have had no interaction with NGET at all. No one has visited us or contacted us so to the extent that any work to be done as part of this project involves NGET using our land there has been a total and complete failure to engage or consult.	The Applicant is seeking rights to permit temporary possession and use of the land for purposes which are no more extensive than those which exist pursuant to the Deed of Grant.
008	<p>Planning Inspectorate should reject the plans and require further consultation:</p> <p>This failure to engage properly with us, despite us as private individuals having sought information from them as to their plans, means that the Planning Inspectorate needs to consider very carefully whether there has in fact been a proper consultation or whether this application should be rejected, and Scottish Power required to conduct another round of adequate consultation. This is particularly the case given that the first indication that our land was included was in the letter dated 22 October moments before they submitted the application.</p>	The Applicant notes this comment and would refer to responses set out above confirming the extent of consultation with the respondent.
009	<p>Breach of human rights if no compensation:</p> <p>No authority has the power to deprive someone of the quiet enjoyment of their land without paying compensation. That is a basic human right which is enshrined in the both in international and in domestic law. Article 1 of the First Protocol of the Human Rights Act</p>	Temporary possession powers have always been a feature of Development Consent Orders (DCO) (and indeed, temporary possession powers can be found within the 2009 Model Provisions). One of the key reasons for including such powers is to avoid the need to acquire a greater interest in land than is necessary and therefore limit the interference with the rights of landowners.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	<p>imposes an obligation of the state not to interfere with the peaceful enjoyment of property or deprive a person of their possession. We understand that that interference with this right can be subject to conditions provided for by law, but it must achieve a fair balance between the general public interest and the protection of an individuals property. It is a fundamental principle of those protections for the individual that any interference must strike a fair balance between the demands of the general interests of the community and the requirement of an individuals fundamental rights. A lack of any compensation would be considered wholly disproportionate. Scottish Power's plans will deprive us from not only our land and our home but the whole of Annabel Newberry's income which is made wholly of the campsite, market garden and ceramist studio, plus a proportion of Simon Newberry's income from his business and the barns where he stores his tools and conducts his business. One part of Newberry Engineering is making demonstration units for leading electrical underfloor heating manufacturer requiring large amounts of the space within the outbuildings. Without this workspace a considerable income source would be lost, or different premises would be required.</p>	<p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).</p>
010	<p>Planning Inspectorate need to consider compulsory purchase powers:</p> <p>We understand that this representation is not meant to cover the issues of precise compensation but we have included our very legitimate concern that Scottish Power may seek to appropriate our land without paying any compensation whatsoever which would infringe our human rights and be unlawful under the statutes under</p>	<p>The land will be used only temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access. Any compensation payable shall be subject to the relevant legislation.</p> <p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	international and domestic law, which allow for that fundamental balance between general public interest and protection of the individual's property.	(temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).
011	<p>DCO powers are too wide and extensive and insufficiently clear:</p> <p>The planning authority should consider the powers which are being requested in the draft Development Consent Order which would appear to be very extensive. The power in s18(1) of the draft DCO provides that the undertaker may compulsorily acquire so much of the Order land as is required for the authorised Project or to facility or is incidental to it. Our property is included in the Order land but Scottish Power (it is included as a red blob on Drawing Number EA2-DEV-DRG-IBR-000796 dated 16/09/19) and therefore is land which can be compulsorily acquired by the developer. Yet they have stated that they do not intend to compulsorily acquire our property. If this is the case, then either they accept that compensation must be payable for such rights to lawful or they need to remove our property from the DCO land in its entirety. Under the draft DCO the applicant should expressly set out which parcels of land are to be acquired. The powers sought are insufficiently precise and should be struck out or turned down by the planning authorities for vagueness.</p>	<p>The Statement of Reasons (APP-026) states that Plot 134 (the land to which this representation relates to) will only be used temporarily for carrying out the authorised project and specifically for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate said access. While existing rights exist over this plot in the form of a Deed of Grant of Easement in favour of National Grid, the Applicant is seeking powers of temporary possession which are of a similar nature to the rights contained within the Deed of Grant but purely on a temporary basis.</p> <p>Temporary possession powers have always been a feature of DCOs (and indeed, temporary possession powers can be found within the 2009 Model Provisions). One of the key reasons for including such powers is to avoid the need to acquire a greater interest in land than is necessary and therefore limit the interference with the rights of landowners.</p> <p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) and of the draft DCO (APP-023).</p>
012	<p>Temporary powers are incompatible with current land usage of sites:</p> <p>Under s26(1) of the draft DCO the applicant is requesting very broad powers to enter into and hold temporary possession of the land specified in column 2 of Schedule</p>	<p>The applicant acknowledges that the statutory notice period for access to land to undertake works is not less than 14 days. However, the Applicant has extensive experience of working with landowners to mitigate the effects of the works on their land use and as such shall endeavour to actively engage with the respondent</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	<p>9. They are requesting the power to remove, building, agricultural plant, drainage, fences and vegetation and he power to use the land as a working site and to conduct any work set out in part 1 of schedule 2. They are also asking for the power to enter into the site on not less than 14 days' notice and then can remain on the site for up to a year after completion of the works. This makes our businesses completely untenable from the date of the Order until a year after the completion of the works. We cannot rehome our chickens and pigs on 14 days' notice. Nor could we continue to run our camping business or our market garden if on 14 days' notice Scottish Power could arrive with diggers.</p>	<p>within reasonable timeframes with regards to the any proposed works on their land.</p>
013	<p>Lack of restrictions on temporary powers/restoration obligations:</p> <p>This is a very draconian power which is being sought and there are no restrictions on how these power could be applied. It should be the case the at Scottish power should need to specify when, what and for how long they are seeking to come onto the land. It would be the norm in development consent orders that the applicant is required to agree a detailed schedule of when it is to carry out what works when if they are temporary works. The powers derived would allow Scottish Power the right to level our home to the ground, including all the buildings on it, our sheds, outbuildings, toilet blocks, electrical hook-ups, fell all our trees, destroy our fences, fill in our pond and after they have finished walk away without having to replace anything, all with no compensation.</p>	<p>Temporary possession powers have always been a feature of DCOs (and indeed, temporary possession powers can be found within the 2009 Model Provisions). One of the key reasons for including such powers is to avoid the need to acquire a greater interest in land than is necessary and therefore limit the interference with the rights of landowners.</p> <p>The Application states that the land will be used only temporarily for areas for works associated with National Grid infrastructure and for access to these works, including any ancillary works necessary to facilitate access for these works. As noted by the respondent, the Applicant has removed the respondent's residential property and outbuilding from the Order limits and as such would have no powers to undertake any such demolition of residential property or building.</p> <p>Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
014	<p>Tree cutting powers are unduly extensive/ have economic consequences for those affected:</p> <p>Under s34 of the DCO there are wide powers for the felling and lopping of trees within or overlapping the Order limits. Much of the woodland on our land is grown and managed by us for the purposes of providing fuel and heating for our home, which is heated by way of woodburning stoves and a woodburning oven. Draconian powers to forcibly destroy trees and plant on our land to make way for temporary works deprives us of fuel and heating. It does not seem appropriate to us for these wide powers to be given with no protections are the amenity setting of our home, which has significant orchards growing many different orchards fruits which we sell as part of our market gardening business. There is no requirement to replace the trees which have been felled, no compensation for the loss of these income bearing assets. The powers derived would allow Scottish Power the right to level our home to the ground, including all the buildings on it Powers sought have potential for extended periods of blight: The power requested to allow for the works to commence up to 7 years after the Order has been made are too extensive. This is a very long period of time for people who are directly affected by the project. We have already been subject to over 2 years of blight and a further 7 years, plus any construction time, means that we are effectively prevented from continuing our livelihood for up to a decade. There is also a cumulative effect of both East Anglia One and Two and potential further extensions which could extend the blight yet</p>	<p>The Applicant notes that the plot is subject to a Deed of Grant of Easement dated 10th February 1966 in favour of National Grid in respect of overhead lines. This Deed of Grant provides NGET with rights to undertake felling and lopping of trees and as such, the powers being sought by the Applicant to carry out woodland management works are no greater than those to which the land is already subject.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	further. This seems wholly disproportionate and is a factor which should be taken into consideration.	
015	<p>Working hours on Site and impact on family life: Scottish Power has asked for very long periods of working on the site, which are wholly incompatible with family life and therefore have the power to breach our human rights. Construction periods are from 7 in the morning to 7 at night 5 days a week with Saturday working between 7-1pm. This would be intolerable from our perspective and these hours should be shortened significantly.</p> <p>Furthermore, the applicant is asking for additional powers to continue construction activities on an unrestricted basis 24 hours a day 7 days a week, including the shipment of abnormal loads, testing and commissioning, this would severely interrupt our sleep and give us no respite at all from the project. It should be noted that although the DCO applications for East Anglia One and East Anglia Two are separate applications, the planning authorities should when considering working hours consider the combined effect of both on the family lives of those living in close proximity to the proposed sites and the cumulative effect of the length of the overall impacts on the environment. It should also be noted that by their own admission Scottish Power accept that the impact of noise of construction on a predominantly rural location is much greater as there is no little background noise, and no background light pollution.</p>	<p>With specific reference to working hours on the respondent's land, it is possible that NGET may undertake works on a 24 hour basis given the strategic importance of the 400kV infrastructure upon which works are proposed. The ability to undertake 24 hour working on the respondent's land is sought only in relation to the following activities:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; • The completion of construction activities commenced during the approved working hours which cannot safely be stopped; • The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>The Applicant notes the comments made and these matters have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared topic responses on these matters:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
		Please see Table 5 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.
016	<p>Noise:</p> <p>The noise portrayed in the application only relates to back ground "humming" during normal operation. The reality is several years of construction noise, would have a devastating effect on our businesses, livestock and general health and wellbeing. (Redacted). Dr Simon Newberry has already been dramatically affected by the stress and has recently been diagnosed with a heart condition and sleep problems brought on by stress of the proposals. Annabel Newberry has also been significantly affected by stress. The noise created both by the construction and operation of the plant proposed would have very negative and detrimental effects on both residents at Fairacre, as well as making their engineering, artistic, camping, market gardening and livestock businesses unworkable. The proposed monitoring of noise by Scottish power is "conveniently" nowhere near our property which will be adjacent to the substation and therefore is merely paying lip service to the requirement to understand the impact of noise on local residents. As one of the closest residents to the site, monitoring equipment should as a minimum be on our property. We are aware that the operation of such sites has the potential to seriously disrupt sleep and given the cumulative effect of a number of substations in this area, with potential additional extension sites in the future, we believe it is unlikely that the applicant will be able to keep the noise to a level which is consistent with ordinary family life. If</p>	<p>The Applicant has conducted a comprehensive construction noise and operational noise impact assessment as part of the Environmental Statement, Chapter 25 Noise and Vibration (APP-073). In addition, a Construction Phase Noise and Vibration Management Plan will be produced as part of the final Code of Construction Practice (required by the draft DCO (APP-023)) and will require the approval of the relevant planning authority. This Plan will describe measures which shall be adopted to minimise noise impacts on receptors and will be based on the detailed design of the Project.</p> <p>Noise monitoring locations for the purpose of the impact assessment have been agreed with the local authorities, and the draft DCO (APP-023) identifies the two closest properties to the onshore substation and National Grid substation which will be the basis of ensuring compliance with the noise limit set out in the draft DCO (APP-023).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	construction goes ahead, it would be imperative to have background noise monitoring of construction and operation on our property. There is no representation or proposals by Scottish Power in limiting construction noise, in fact they have in their latest proposal increased construction time periods to 24 hours.	
017	<p>Substation switchgear:</p> <p>There is no mention of operational noise coming from the substation switchgear. Dr Newberry's experience as a Project Manager at the Galloper Substation at Sizewell Gap has provided personal knowledge that the Air Insulated switches outside will be heard at short distances. The noise insulated GIS hall proposed, which is very close to our property, will have Gas Insulated Switches operating 24 hours a day. These can be activated by maintenance, general operation and tripping creating a very loud "thunder clap" type of noise, which can still be heard at a considerable distance even though suppressed. This could be alarming to anyone living within such a close vicinity to the site.</p>	<p>The Applicant notes concerns regarding the use of air insulated switchgear (AIS) at the onshore substation, the Chapter 25 Noise and Vibration (APP-073) presents a comprehensive noise and vibration impact assessment of the onshore substation and National Grid substation. The onshore substation gas insulated switchgear (GIS) hall has been included in the noise model and the noise impact assessment. Appendix 25.5 Operational Phase Assessment (APP-526) details the approach taken to the proposed Project operational noise impact assessment modelling. The assessment undertaken demonstrates that, post mitigation, all operational impacts from the onshore substation have a maximum residual impact of negligible significance.</p> <p>Intermittency and impulsivity of the GIS is discussed in section 25.4.3.4 of Chapter 25 Noise and Vibration (APP-073). With regards to intermittency and impulsivity of the GIS, there would be no expected stops and starts to the fixed electrical plant. There are also no items of fixed electrical plant with impulsive characteristics under typical operating conditions. Where there may be air cooling fans that stop and start, this is not considered to be distinctly audible at the receptor nor above background ambient noise levels due to masking effects. Impacts on nearby residential receptors are assessed in section 25.6.2.1 using BS4142 criteria. Impacts are of negligible significance for all residential receptors when mitigated through an operational rating noise limit (in accordance with BS4142:2014+A1:2019) of 34dBA at the nearest sensitive receptors during the day time and night time, as secured through the draft DCO (APP-023).</p> <p>With regards to operational noise from the National Grid infrastructure (section 25.3.2.1 of Chapter 25 Noise and Vibration), it does not contain plant such as</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
		high voltage transformers or shunt reactors, or rotating plant such as transformer coolers, that would usually be the dominant noise sources from a substation during operation. The worst-case assumes that this infrastructure will use AIS however these items of plant are designed to be inherently quiet in operation, and do not make operational noise at a level that would be perceptible at nearby residential receptors.
018	Impact on tourism: The reality is that this development will have a serious impact not only on our campsite but on tourism in general if the development consent order is granted. Our business will be wholly lost, and the many other businesses which depend on tourism in this area will also be hugely impacted despite Suffolk Coastal Council actively promoting Tourism. The noise, dust and loss of views will deter regular and new visitors to the site, the loss of the "quiet site" status would undoubtedly be removed from our campsite, even if after it has been temporarily taken away from us with no compensation, we finally get our land back. Not only would we lose a considerable annual income, local shops, restaurants and pubs, used by the campsite visitors would have a noticeable drop in business. Impact on wildlife: We would lose birds and wildlife which are a draw for the campsite. There would undoubtedly be disruption to migratory swallows and bats that roost at the property and all the wildlife that use our nature pond. The proposals would also completely disrupt / remove numerous country walks and footpaths / rights of way, another draw for our tourists.	<p>The Applicant notes the comment made regarding the impact of the Applicant's proposals on traffic and access and this has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on this matter:</p> <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p>
019	<p>Livestock:</p> <p>With the acquisition of our land, even if only for the period of construction, our livestock business will be lost. Our</p>	Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	chickens are free range and roam the fields at leisure, which will no longer be possible, and we would lose the income from eggs. The annual pig livestock will no longer be possible due to the pens being acquisitioned for the "construction depot" and we would need to cease this business.	(temporary use of land for carrying out the authorised project) of the draft DCO (APP-023).
020	<p>Construction:</p> <p>Initial consultation stated set working hours; this appears to have change to 24 hours, which would leave our property subject to dust almost continually. There is no proposal to limit noise and dust with respect to our property, which is one of the closest. The proposals show insufficient monitoring of construction.</p>	<p>Construction activities would normally be conducted during Monday to Friday working hours of 7am to 7pm and Saturday working hours of 7am to 1pm. Working hours are not proposed for Sundays or Bank Holidays. These working hours have been reduced on Saturdays from those originally proposed following feedback received from Section 42 consultation. Exceptions to these working hours for the works are described in section 6.9 of Chapter 6 Project Description (APP-054), for the landfall, onshore cable route and onshore substation include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the ES, such as concrete pouring, dewatering, cable pulling, cable jointing and trenchless technique; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>For the National Grid infrastructure, these exemptions include:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
		<p>conductors, pilot wires and associated protective netting across highways or public footpaths;</p> <ul style="list-style-type: none"> Fitting out works associated with the National Grid substation; The completion of construction activities commenced during the approved working hours which cannot safely be stopped; The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>Working hours are secured through Requirement 23 and Requirement 24 of the draft DCO (APP-023) and will be signposted within the final Code of Construction Practice prepared post-consent to discharge Requirement 22 of the draft DCO (APP-023). The final Code of Construction Practice must accord with the Outline Code of Construction Practice submitted with the Application (APP-578), which provides detail on working hours within section 3.1.</p>
021	Here appears to be insufficient or no impact studies on traffic, drainage, cable corridor construction issues, local heritage and effect on tourism. Disruption to the environment, especially local wildlife and their habitat or the impact on the loss of valuable agricultural land.	<p>The Applicant notes the comments made and these matters have been raised by a number of individual Relevant Representations. The Applicant has therefore prepared topic responses on these matters:</p> <ul style="list-style-type: none"> Traffic <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p> <ul style="list-style-type: none"> Drainage <p>Please see Table 32 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
		<p>Applicant's comments on Relevant Representations regarding water resources and flood risk.</p> <ul style="list-style-type: none"> Cable Corridor Construction Issues <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore cable route.</p> <p>Please see Table 21 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – construction strategy</p> <ul style="list-style-type: none"> Local Heritage and Effect on Tourism <p>Please see Table 30 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p> <p>Please see Table 4 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cultural heritage.</p> <ul style="list-style-type: none"> Local Wildlife and Habitat <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
		<p>Please see Table 33 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding woodland.</p> <p>Please see Table 19 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p> <ul style="list-style-type: none"> • Loss of Agricultural Land <p>Please see Table 11 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding land use.</p>
022	Traffic and Access: The increase in traffic due to construction and deliveries will increase noise, travel times and general exhaust pollution. Grove road and other minor roads will become "rat runs" for traffic trying to avoid the major construction routes. Grove road is one of the National cycle routes, it will become extremely dangerous for cyclists as the construction traffic and delivery vehicles increase. Access to our property will be hampered by the increase in traffic. New "access routes" to the substation and cable routes, although with the latest proposals were never in the original consultations, specifically ones leading off Grove Road.	<p>The Applicant notes the comment made regarding the impact of the Applicant's proposals on traffic and access and this has been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on this matter:</p> <p>Please see Table 2 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>
023	Views: We moved to the property for the "quiet life" and beautiful country views. Due to "Technical Issues" we have been informed that it will not be possible to construction bunds and /or screening between ourselves and the substation.	<p>The Applicant notes the comment made regarding the impact of the Applicant's proposals on visual impact and this has been raised by a number of individual Relevant Representations. The Applicant has therefore prepared a topic response on this matter:</p>

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No	Relevant Representation	Applicant's Comments
	We have been given no explanation of why there can be no amelioration of what is a large industrial complex in a completely rural location. We will have and be within full view of this blight on the landscape.	Please see Table 31 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.
024	<p>Property devaluation and Compensation:</p> <p>Scottish power have informed us that there will be no compensation. This will be crippling to our personal finances, ability to support ourselves and our health and wellbeing. The property is now (due to the proposals) and in the foreseeable future unsaleable at a reasonable market rate. The years of personal and financial investment in the house, gardens, land and businesses will be lost without compensation. The planned further property improvements and business expansion, specifically with regards to the campsite and tourism are now in doubt, creating a stressful hiatus in our lives.</p>	<p>A number of Relevant Representations raise concerns with regards to reduction in the value of properties and house prices.</p> <p>The impact of the Project on house prices is not a material consideration. There are many reasons why house prices vary and, in any event, policy does not seek to prohibit activities which may have such effects. National Policy Statements do however offer specific policy support for the assessment of effects that a project may have on residential receptors. The Environmental Statement has provided appropriate impact assessment on residential receptors in line with the overarching National Policy Statements in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5). The potential impact on residential receptors has been considered throughout the development of the Project and this is reflected in the site selection process reported in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). In addition, the potential effects on residential receptors and residents has been further considered and evaluated in other topic specific chapters, including Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 74 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>The potential impact on non-residential land uses has been evaluated through Chapter 21 Land Use (APP-069) and Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). Appendix 21.1 (APP-499) details the relevant consultation undertaken. It is noted that, in terms of subsection 87(3) of the Planning Act 2008, representations that relate to compensation for compulsory acquisition of land or of an interest in or right over land are matters which the ExA may disregard.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
025	<p>Friston Parish Council representations:</p> <p>We have reviewed the Friston Parish Council representations, and the key issues put forward by Friston Parish Council and agree as a local resident with all of the issues which have been advanced. We fully support these issues and incorporate each and every one of those issues by reference into our submission as though we had written them all out in full here. We include every issue which has been raised by Friston Parish Council as our own objections to Scottish Power's proposals and draft DCO application. SASES representations: We have reviewed the representations put forward by the SASES, and the key issues put forward by SASES and agree with all of the issues which have been advanced. We fully support these issues and incorporate each and every one of those issues by reference into our submission as though we had written them all out in full here. We include every issue which has been raised by SASES as our own objections to Scottish Power's proposals and draft DCO application.</p>	<p>The points raised in the SASES Relevant Representation have been considered and are addressed in Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1). The points raised in the Friston Parish Council Relevant Representation have also been considered and are addressed in Table 9 in Applicant's Comments on Relevant Representations Volume 3 (document reference ExA.RR3.D0.V1).</p>
026	<p>Failure to comply with both letter and spirit of the planning laws:</p> <p>Finally, Scottish power seemed to have forged ahead with their plans without consideration to the locals or ourselves. They have shown complete disregard of public consultations, provided misleading information prior to actual planning proposals and until recently completely concealed the planned acquisition of our land for the construction period. They seem to seek to hide behind NGET lease granted to maintain existing infrastructure to</p>	<p>Detail regarding specific consultation with the respondent has been confirmed previously and further detail on consultation with the wider local community is summarised in Table 1 of Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1). .</p> <p>While existing rights exist over this plot in the form of a Deed of Grant of Easement in favour of National Grid Electricity Transmission, the Applicant is seeking powers of temporary possession which of a similar nature to the rights contained within the Deed of Grant but purely on a temporary basis as opposed to in perpetuity.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No	Relevant Representation	Applicant's Comments
	<p>seek to absolve them of the obligation to compensate us for the loss of amenity, loss of value, and impacts on our health, finances and wellbeing. Scottish Power will make huge sums of money from consumers selling power with state subsidies and underwriting of the power price. And yet they will be able to drive small holders, small businesses and local residents impecunious with impunity. We have been treated disgracefully throughout this process and object to the powers being granted in the manner sought. This is a case of "big business" using National Infrastructure regulations to treat individuals as inconsequential in the greater scheme of things, which is against both the letter and the spirit of the planning laws.</p>	<p>The Project only requires temporary possession to implement the relevant works. Compensation will be payable to the owners and occupiers of land of which temporary possession is taken as set out within the provisions of Articles 26 (temporary use of land for carrying out the authorised project) of the <i>draft DCO</i> (APP-023).</p>



2.22 Simon Ward on Behalf of Petula Ward (RR-867)

Table 44 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Simon Ward on behalf of Petula Ward RR-867	140, 141	Temporary Occupation and Use	Occupier

Table 45 Applicant's Comments on Petula Ward's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>Dear sir,</p> <p>Concerning the substation at grove road friston. My parents petula [Redacted] live at [Redacted]</p> <p>If this goes ahead(no doubt minds have been made up by now anyway) the values of the properties that my parents and also good family friend [Redacted] also living and have lived for 45 years will be devalued, privacy will be lost, road congested, not to mention the nature effect this monstrosity will have negatively for the next 15 years while building. plus in the future. surely if this monstrosity is going ahead my parents [Redacted] should be compensated very generously as this is impacting their lives massively!!</p>	<p>The impact of the Project on house prices is not a material consideration. There are many reasons why house prices vary and, in any event, policy does not seek to prohibit activities which may have such effects. National Policy Statements do however offer specific policy support for the assessment of effects that a project may have on residential receptors. The Environmental Statement has provided appropriate impact assessment on residential receptors in line with the overarching National Policy Statements in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5). The potential impact on residential receptors has been considered throughout the development of the Project and this is reflected in the site selection process reported in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). In addition, the potential effects on residential receptors and residents has been further considered and evaluated in other topic specific chapters, including Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 74 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>The potential impact on non-residential land uses has been evaluated through Chapter 21 Land Use (APP-069) and Chapter 30 Tourism, Recreation and</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Socio-Economics (APP-078). Appendix 21.1 (APP-499) details the relevant consultation undertaken. It is noted that, in terms of subsection 87(3) of the Planning Act 2008, representations that relate to compensation for compulsory acquisition of land or of an interest in or right over land are matters which the ExA may disregard.</p> <p>The Applicant has looked to address this comment in their responses:</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p>



2.23 St. Edmundsbury and Ipswich Diocesan Board of Finance (RR-079)

Table 46 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
St Edmundsbury and Ipswich Diocesan Board of Finance RR-079	99	Freehold Purchase	in respect of restriction, easements and restrictive covenants

Table 47 Applicant's Comments on St Edmundsbury and Ipswich Diocesan Board of Finance's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>This representation is made specifically in relation to registered Title Number SK276346 at Friston, there is no facility to upload a copy here but this can be provided if required.</p> <p>This land was sold by us on the 17th November 2010, subject to the following covenants:</p> <p>11.2 The Transferee to the intent that the covenants hereinafter contained shall bind the Property into whosoever hands the same may come and for the benefit and protection of any neighbouring diocesan glebe church or parsonage land and each and every part covenants for itself and its successors in title with the Transferor and its successors pursuant to Section 22 of the Endowments & Glebe Measure 1976 as follows:</p> <p>11.2.1 no act deed matter or thing shall at any time be done suffered or permitted in or upon the Property which may be or become a nuisance annoyance or disturbance to the incumbent for the time being of the benefice of which the parish of Friston forms part or his successors or which may tend to depreciate or lessen the value of any</p>	<p>The property the respondent refers to falls within land the Applicant is seeking Freehold Acquisition for planting and bunding works for landscaping and the maintenance of the landscaping. It also required for temporary works to install the Sustainable Drainage System and associated pipes to connect into the local drainage network, and to divert and create new public footpaths.</p> <p>It should be noted that the Applicant would only be seeking to carry out works temporarily that would impact on the covenants referred to by the respondent and any compensation as result of this would be resolved under Section 125 of the Planning Act 2008.</p> <p>The Applicant notes the comment made and will continue to work constructively with landowners, occupiers, holders of rights and their respective representatives.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>adjoining or neighbouring diocesan glebe church land and parsonage land.</p> <p>11.2.2 no act deed matter or thing shall at any time be done suffered or permitted in or upon the Property which may be or become a nuisance annoyance or disturbance to the minister for the time being conducting or the congregation attending divine service in the parish church of Friston or the churchyard surrounding it.</p> <p>11.2.3 not to use or permit the Property to be used otherwise than for agricultural purposes and in particular not to erect or carry out or permit to be erected or carried out any building or other development on the Property whether permanent temporary or otherwise.</p> <p>11.2.4 not to sell or otherwise dispose or transfer the Property or any part of it without requiring the purchaser or other transferee to enter into a separate deed of covenant with the Transferor in the same terms as this covenant and without requiring every such purchaser or transferee to bear the Transferor's solicitors' reasonable costs and disbursements for the preparation and completion of such deed.</p> <p>We would wish that any planning decision have regard to these covenants and would object to any consent that permitted them to be breached. If you require any further details, please do make contact.</p>	



2.24 The Ogilvie Family Trust (RR-063)

Table 48 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Bidwells on behalf of The Ogilvie Family Trust RR-063	52	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	51, 53	Temporary Occupation and Use	Owner
	57	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner (in respect of subsoil beneath half width of public highway)
	50, 54, 56	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner

Table 49 Applicant's Comments on The Ogilvie Family Trust Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>ALTERNATIVE LANDFALL OPTIONS</p> <p>We are aware that the Government are considering an alternative strategy proposed for delivery of the energy produced by offshore windfarms to the National Grid, with an emphasis to rationalise the number of individual connections and cable route requirements through the construction of an Offshore Ring Main.</p> <p>The question arising from this given the potential timescale for the development of this Project, is whether due consideration has been given to the</p>	<p>The construction of an offshore ring main has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 17 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding the offshore ring main.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	likelihood of this option being available and therefore the potential removal of the need to develop both the cable route and transformer site as currently proposed.	
002	<p>CONSULTATION AND ENGAGEMENT</p> <p>While there have been constructive and proactive face to face meetings with SPR and it's agents, the detail required by the landowners or occupiers has either been provided late or has not been available. For example, details on timings of construction to be able to understand the impact on the cropping rotation of the farm, the detailed cable route and the locations for the temporary working areas (Construction Consolidation Sites). This lack of information has made it difficult for the landowners/ occupiers to plan their businesses going forward, particularly if they intend to invest in new infrastructure or buildings which in general will not be permitted in the areas required for the Project. We ask that, going forward, information required by the landowners is provided promptly when requested.</p>	<p>The Applicant has provided requested information when and where possible and will continue to work constructively with the respondent.</p>
003	<p>TIMING OF CONSTRUCTION WORK</p> <p>To date, Scottish Power Renewables (SPR) have been unable to advise in any detail on the likely timing for the construction of the East Anglia TWO (EA2) Project, nor how its development will be tied into the Project SPR are developing in parallel, East Anglia ONE North (EA1N), the subject of a second Development Consent Order (DCO). The landowner(s) and / or occupier(s) are concerned about the cumulative impact of the two</p>	<p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners and occupiers and continue to communicate likely timings of construction and proposed entry dates giving as much notice as is practical.</p> <p>Chapter 6 Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	Projects and believe that it is essential that both Projects are built simultaneously to mitigate the effect on their property and the resulting losses incurred, with the total build period not to exceed two years from the date of entry.	<ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months; Landfall: up to 12 months; Onshore Cable Route: up to 24 months; Onshore Substation: up to 30 months; National Grid Substation: up to 48 months; National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months; and Commissioning and Reinstatement: up to 12 months. <p>Plate 6.32 within Chapter 6 Project Description presents an indicative onshore cable route construction sequence which illustrates the periodic nature of construction at each of the four sections of onshore cable route.</p> <p>The East Anglia TWO offshore windfarm project and East Anglia ONE North offshore windfarm project are two separate projects which are the subject of two separate DCO applications. The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>At this stage it is not known whether both Projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p> <ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>Scenario 1 assumes that the landfall, onshore cable corridor and onshore substation construction periods for the two projects occur over the same period as</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

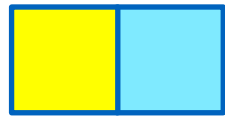
No.	Relevant Representation	Applicant's Comments
		<p>would have occurred for a single project (the anticipated programme is presented in section 6.9 of Chapter 6 Project Description) and is summarised above.</p> <p>Scenario 2 assumes onshore construction of the first project and it's full re-instatement, followed by the construction of the second project at a later date. The construction duration of each project is as illustrated above These cumulative assessment scenarios also ensure that a partial overlap in project construction has been fully assessed within the ES.</p> <p>In fully assessing the above scenarios within the ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.</p>
004	<p>NOTICE OF ENTRY</p> <p>Should the DCO be approved, landowners and occupiers would require a minimum 12 month period of Notice (ideally 18 months) prior to entry being taken to their land.</p>	<p>The length of notice that would be provided on a statutory basis is 14 days. In practice, the Applicant will work constructively with landowners, occupiers and their representatives and communicate proposed entry dates giving as much notice as is practically possible.</p>
005	<p>ABOVE AND BELOW GROUND STRUCTURES</p> <p>Jointing Bays should all be located underground, so as not to interfere with normal agricultural operations. Should Link Boxes be required, then these should be located within a tight cluster set level to the surrounding ground level (save as where otherwise agreed) within or adjacent to field boundaries. Our preference is that all Link Boxes are located within field boundaries. No clarification has been received from SPR as to how many, if any, Link Boxes will be required.</p>	<p>Chapter 6 Project Description (APP-054) advises that jointing bays installed underground and will be constructed at intervals along the onshore cable route (to allow cable pulling and jointing at a later stage), one jointing bay per trench. Each jointing bay would be up to 15m long x 3m wide x 1.7m deep; if double jointing bays (i.e. a double jointing bay for both trenches) are constructed these will be up to 15m long x 9m wide x 2.5m deep. The precise location of the jointing bays will be determined during detailed design. Link boxes will be installed underground, and the precise location of the link boxes will be determined during detailed design.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
006	<p>FIELD DRAINAGE</p> <p>Drainage consultants with relevant practical experience and experience of working in Suffolk should be engaged by SPR to carry out a pre and post construction assessment of the impact that the proposed construction of the onshore infrastructure associated with the Project (EA2) will have or has had on drainage and, prior to undertaking the proposed drainage schemes, will consult with the landowner and occupier and their appointed drainage consultant on the design of any land drainage works required in connection with the construction works and on the design of any land drainage works required for the subsequent restoration of drainage on the landowners' / occupiers retained land.</p>	<p>The Applicant is obliged to produce a Surface Water and Drainage Management Plan to reflect the final project design as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan will be made available ahead of the commencement of construction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to pre and post construction drainage strategies and works.</p>
007	<p>SOIL MANAGEMENT</p> <p>The treatment and reinstatement of soil during and after construction is one of the main issues of concern. Limited information has been provided, to date, to landowners and occupiers. We note from the Outline Code of Construction Practice (OCoCP), reference to the preparation of a Soil Management Plan and that the appointed contractor will be required to comply with this. We have not had the opportunity to review or comment on this plan, but the following requirements should be included, as a minimum;</p> <ul style="list-style-type: none"> • prior to the commencement of work, detailed testing should be undertaken to establish existing soil nutrient values and soil profiles and condition over both the 	<p>The Applicant is obliged to produce a Soil Management Plan to reflect the final project design as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Soil Management Plan is will be made available ahead of the commencement of construction.</p> <p>The Applicant will work constructively with landowners, occupiers and their representatives with regards to soil management.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>working areas and adjacent land which will be sterilised from production;</p> <ul style="list-style-type: none"> • details of soils handling, storage, management and reinstatement; • details of post completion soils testing and aftercare management; • an Agricultural Liaison Officer to be appointed to oversee the implementation of the Soil Management plan and to act as a liaison between the landowners(s), occupier(s) and contractors. 	
008	<p>IRRIGATION</p> <p>It is noted that the OCoCP does not address the issue of management and maintenance of individual landowners and occupiers field irrigation systems. We consider that the following requirements should be included as a minimum;</p> <ul style="list-style-type: none"> • prior to the commencement of any work, all field irrigation systems in the vicinity of the works should be identified and recorded. • following consultation with individual landowners and occupiers, independent irrigation consultants / contractors should be appointed to advise on both temporary and, where necessary, permanent diversions of irrigation mains to ensure that throughout the construction period SPR maintain water supplies to any areas severed by the works, to ensure that all land previously capable of irrigation remains so. 	<p>The Applicant has had productive and continuing discussions with the respondent with regards to the maintenance of irrigation systems during construction and any necessary pre or post construction works required to the respective irrigation systems.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
009	FLOOD ISSUES No details have been provided to landowners and occupiers on how any increase in surface water run off from the haul road and the temporary working areas will be managed and dissipated during the construction period.	There is a commitment to produce a Surface Water and Drainage Management Plan as part of the oCoCP (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan will be made available when it is possible to do so.
010	DUST Clarification is required on how practical issues, like dust, will be controlled during the construction period.	An Air Quality Management Plan (AQMP) is required to be included within the Code of Construction Practice (CoCP) which must be submitted to the Local Planning Authority for approval prior to commencement of the works. The AQMP will detail control measures to manage dust and emission during construction works. Again this is a matter has also been raised in other representations and a topic response has been prepared: Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.
011	ACCESS If the DCO is confirmed, defined routes of access for pre-construction works, the construction works and post construction remedial works and maintenance will need to be agreed with individual landowners and occupiers.	The Applicant has had productive and continuing discussions with the respondent with regards to the appropriate routes of access and egress.
012	It is noted that no detail has, to date, been provided to landowners and occupiers as to how they will access land severed by the construction works, which will need to be agreed prior to the commencement of the work.	Upon confirmation of the detailed design, the Applicant will work constructively with landowners, occupiers and their representatives with regards to access to severed land.

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
013	<p>RESTRICTIONS</p> <p>It is accepted that over the easement width, it would be inappropriate to construct permanent buildings or facilities that would impinge on SPR's ability to access the cables. However, such restrictions should not extend to semi-permanent works, such as the construction of areas of hardstanding (for storage or parking purposes) and / or tracks undertaken using hardcore and other loose fill material. It is essential that the areas of land subject to any permanent restrictions as a result of the Project are kept to a minimum.</p>	<p>The Statement of Reasons (APP-026) advises that permanent rights will be required to retain and carry out future works to the onshore cables over land of up to approximately 20m in width. This would alter where construction processes or other reasons necessitate permanent rights being required over a wider area (i.e. where trenchless techniques is utilised or unexpected engineering difficulties occur) or, as mentioned, where the maximum width of land required is reduced to 16.1m.</p> <p>The requirement for permanent rights over land of approximately 20m in width is justified on the basis that there would be up to six electrical cables, two fibre optic cables and two distributed temperature sensing cables, laid in two trenches within this permanent corridor with sufficient spacing between cable trenches to ensure thermal separation, in addition to room for any operation and maintenance works. The width of the land over which permanent rights are sought is comparable with similar schemes.</p>
014	<p>DEPTH OF CABLES</p> <p>We note from the OCoCP, that the onshore cables will typically be laid in trenches approximately 1200mm below ground level. To date, landowners and occupiers have been advised that there will be a restriction on the depth to which cultivations can be undertaken without prior approval from SPR of 650mm which is insufficient. Taking account of the prevailing soil type, i.e. light sandy soil, the geographical location of the cable route (close to the East Coast) then it is considered that there is a high propensity for 'wind blow' to be a significant factor over the anticipated life of the Project. To this end, the proposed typical depth of 1200mm is considered insufficient and that as a minimum, the cables should be laid at a depth of 1500mm. Increasing the depth of the cables, will also</p>	<p>Onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural activities over the cables.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

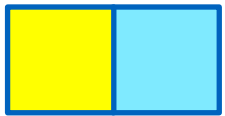
No.	Relevant Representation	Applicant's Comments
	enable the restriction on cultivation depth (without prior approval) to be increased to 950mm.	
015	<p>WORKING HOURS</p> <p>The proposed working hours within the OCoCP, of 7.00am to 7.00pm, Monday to Friday and 7.00am to 1.00pm on Saturday's, with no construction works on Sundays or Bank Holidays, are acceptable and should be confirmed in the DCO to enable enforcement. There should be no exceptions other than in response to emergency situations.</p>	<p>The acceptability of the working hours is noted.</p> <p>Exceptions to these working hours for the works are described in section 6.9 Onshore Programme of Chapter 6 Project Description (APP-054), for the onshore substation these include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the ES, such as concrete pouring, dewatering, cable pulling, cable jointing and trenchless technique; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>For the National Grid infrastructure, these exemptions include:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; • Fitting out works associated with the National Grid substation; • The completion of construction activities commenced during the approved working hours which cannot safely be stopped; • The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>Working hours are secured through Requirement 23 and Requirement 24 of the draft DCO (APP-023) and will be signposted within the final Code of Construction Practice prepared post-consent to discharge Requirement 22 of the draft DCO. The final Code of Construction Practice must accord with the Outline Code of Construction Practice (APP-578) submitted with the Application, which provides detail on working hours within section 3.1.</p>
016	<p>CONSTRUCTION MITIGATION MEASURES</p> <p>We note from the OCoCP, that noise and vibration management measures are to be implemented during the construction period and brief details of these have been provided. We would ask that as a minimum, more detailed consideration of physical mitigation measures that could be undertaken during the construction period to minimise disturbance to local residents are considered, including strategic banking of topsoil to form an acoustic bund.</p>	<p>The noise and vibration during construction topic response has been prepared:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Of particular relevance to the query raised by the respondent, please see the extract below:</p> <p>"Construction phase noise will be controlled through the production of a Construction Phase Noise and Vibration Management Plan post-consent, which is to be submitted to and approved by the local planning authority in advance of construction works commencing, as part of the Code of Construction Practice secured under Requirement 22 of the draft DCO (APP-023). The specific control measures set out within the Construction Phase Noise and Vibration Management Plan will be complied with during the construction phase. Best practice noise mitigation measures, to be implemented and controlled through the Construction Phase Noise and Vibration Management Plan (in relation to the installation of the onshore cable route), will typically include:</p> <ul style="list-style-type: none"> Management of construction operating hours; Use of screens and noise barriers / acoustic screens; Construction site layout to minimise or avoid reversing with use of banksmen where appropriate. Output noise from reversing alarms set at levels for health and safety compliance;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • Use of modern, fit for purpose, well maintained plant and equipment to minimise noise generation. Plant and vehicles will be fitted with mufflers /silencers maintained in good working order. Use of silenced equipment, as far as possible and low impact type compressors and generators fitted with lined and sealed acoustic covers. Doors and covers housing noise emitting plant will be kept closed when machines are in use; • No audible music or radios to be played outdoors on site; • Ensuring engines are switched off when machines are idle and • Regular communication with site neighbours to inform them of the construction schedule, and when noisy activities are likely to occur.



2.25 The Sizewell Estate Partnership (RR-073)

Table 50 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
From Bidwells on behalf of The Sizewell Estate Partnership RR-073	34, 36, 45	Temporary Occupation and Use	as assumed owner
	19, 33	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	51, 53	Temporary Occupation and Use	in respect of right of access to construct and maintain services
	8, 9, 26, 29, 31, 32, 35, 38, 44, 48	Temporary Occupation and Use	Owner
	43	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner
	46	Temporary Occupation and Use and Acquisition of Permanent Rights	as assumed owner (in respect of subsoil beneath public highway)
	50, 54, 56	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of access to construct and maintain services
	2, 4, 5, 6, 7, 11, 12, 13, 14, 15, 16, 22, 23, 24, 25, 27, 28, 30, 39, 40, 41, 42, 47, 49	Temporary Occupation and Use and Acquisition of Permanent Rights	Owner



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

Table 51 Applicant's Comments on the Sizewell Estate Partnership's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>ALTERNATIVE LANDFALL OPTIONS</p> <p>We are aware that the Government are considering an alternative strategy proposed for delivery of the energy produced by offshore windfarms to the National Grid, with an emphasis to rationalise the number of individual connections and cable route requirements through the construction of an Offshore Ring Main.</p> <p>The question arising from this given the potential timescale for the development of this Project, is whether due consideration has been given to the likelihood of this option being available and therefore the potential removal of the need to develop both the cable route and transformer site as currently proposed.</p>	<p>The construction of an offshore ring main has also been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter:</p> <p>Please see Table 17 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding the offshore ring main.</p>
002	<p>CONSULTATION AND ENGAGEMENT</p> <p>While there have been constructive and proactive face to face meetings with SPR and it's agents, the detail required by the landowners or occupiers has either been provided late or has not been available. For example, details on timings of construction to be able to understand the impact on the cropping rotation of the farm, the detailed cable route and the locations for the temporary working areas (Construction Consolidation Sites). This lack of information has made it difficult for the landowners/ occupiers to plan their businesses going forward, particularly if they intend to invest in new infrastructure or buildings which in general will not be permitted in the areas required for the Project. We ask that, going forward, information required by the landowners is provided promptly when requested.</p>	<p>The Applicant has provided requested information when and where possible and will continue to work constructively with the respondent.</p> <p>The Applicant has had productive and continuing discussions with the respondent and these include making provision for the landowner to invest in new infrastructure and buildings.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
003	<p>TIMING OF CONSTRUCTION WORK</p> <p>To date, Scottish Power Renewables (SPR) have been unable to advise in any detail on the likely timing for the construction of the East Anglia TWO (EA2) Project, nor how its development will be tied into the Project SPR are developing in parallel, East Anglia ONE North (EA1N), the subject of a second Development Consent Order (DCO). The landowner(s) and / or occupier(s) are concerned about the cumulative impact of the two Projects and believe that it is essential that both Projects are built simultaneously to mitigate the effect on their property and the resulting losses incurred, with the total build period not to exceed two years from the date of entry.</p>	<p>The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>The Applicant will work constructively with landowners and occupiers and continue to communicate likely timings of construction and proposed entry dates giving as much notice as is practical.</p> <p>Chapter 6 Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months. Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months. National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a window period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>Plate 6.32 within Chapter 6 Project Description presents an indicative onshore cable route construction sequence which illustrates the periodic nature of construction at each of the four sections of onshore cable route.</p> <p>The East Anglia TWO offshore windfarm project and East Anglia ONE North offshore windfarm project are two separate Projects which are the subject of two separate Applications. The draft DCOs require each project to commence construction within seven years of the date of the DCOs coming into force.</p> <p>At this stage it is not known whether each Project would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p> <ul style="list-style-type: none"> • Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and • Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>Scenario 1 assumes that the landfall, onshore cable corridor and onshore substation construction periods for the two projects occur over the same period as would have occurred for a single project (the anticipated programme is presented in section 6.9 of Chapter 6 Project Description and is summarised above.</p> <p>Scenario 2 assumes onshore construction of the first project and it's full re-instatement, followed by the construction of the second project at a later date. The construction duration of each project is as illustrated above These cumulative assessment scenarios also ensure that a partial overlap in project construction has been fully assessed within the ES.</p> <p>In fully assessing the above scenarios within the ES, the Applicant has retained the necessary flexibility to adopt the optimum delivery solution for the project which reflects the supply chain constraints and opportunities at the time.</p>
004	<p>NOTICE OF ENTRY</p> <p>Should the DCO be approved, landowners and occupiers would require a minimum 12 month period of Notice (ideally 18 months) prior to entry being taken to their land.</p>	<p>The length of notice that would be provided on a statutory basis is 14 days.</p> <p>The Applicant will work constructively with landowners, occupiers and their representatives and communicate proposed entry dates giving as much notice as is practically possible.</p>



No.	Relevant Representation	Applicant's Comments
005	<p>ABOVE AND BELOW GROUND STRUCTURES</p> <p>Jointing Bays should all be located underground, so as not to interfere with normal agricultural operations. Should Link Boxes be required, then these should be located within a tight cluster set level to the surrounding ground level (save as where otherwise agreed) within or adjacent to field boundaries. Our preference is that all Link Boxes are located within field boundaries. No clarification has been received from SPR as to how many, if any, Link Boxes will be required.</p>	<p>Chapter 6 Project Description (APP-054) advises that jointing bays installed underground and will be constructed at intervals along the onshore cable route (to allow cable pulling and jointing at a later stage), one jointing bay per trench. Each jointing bay would be up to 15m long x 3m wide x 1.7m deep; if double jointing bays (i.e. a double jointing bay for both trenches) are constructed these will be up to 15m long x 9m wide x 2.5m deep. The precise location of the jointing bays will be determined during detailed design. Link boxes will be installed underground, and the precise location of the link boxes will be determined during detailed design.</p>
006	<p>FIELD DRAINAGE</p> <p>Drainage consultants with relevant practical experience and experience of working in Suffolk should be engaged by SPR to carry out a pre and post construction assessment of the impact that the proposed construction of the onshore infrastructure associated with the Project (EA2) will have or has had on drainage and, prior to undertaking the proposed drainage schemes, will consult with the landowner and occupier and their appointed drainage consultant on the design of any land drainage works required in connection with the construction works and on the design of any land drainage works required for the subsequent restoration of drainage on the landowners' / occupiers retained land.</p>	<p>The Applicant is obliged to produce a Surface Water and Drainage Management Plan to reflect the final project design as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan will be made available ahead of the commencement of construction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to pre and post construction drainage strategies and works.</p>
007	<p>SOIL MANAGEMENT</p> <p>The treatment and reinstatement of soil during and after construction is one of the main issues of concern. Limited information has been provided, to date, to landowners and occupiers. We note from the Outline Code of Construction Practice (OCoCP), reference to the preparation of a Soil</p>	<p>The Applicant is obliged to produce a Soil Management Plan to reflect the final project design as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Soil Management Plan is will be made available ahead of the commencement of construction.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	<p>Management Plan and that the appointed contractor will be required to comply with this. We have not had the opportunity to review or comment on this plan, but the following requirements should be included, as a minimum;</p> <ul style="list-style-type: none"> • prior to the commencement of work, detailed testing should be undertaken to establish existing soil nutrient values and soil profiles and condition over both the working areas and adjacent land which will be sterilised from production; • details of soils handling, storage, management and reinstatement; • details of post completion soils testing and aftercare management; • an Agricultural Liaison Officer to be appointed to oversee the implementation of the Soil Management plan and to act as a liaison between the landowners(s), occupier(s) and contractors. 	<p>The Applicant will work constructively with landowners, occupiers and their representatives with regards to soil management.</p>
008	<p>IRRIGATION</p> <p>It is noted that the OCoCP does not address the issue of management and maintenance of individual landowners and occupiers field irrigation systems. We consider that the following requirements should be included as a minimum;</p> <ul style="list-style-type: none"> • prior to the commencement of any work, all field irrigation systems in the vicinity of the works should be identified and recorded. • following consultation with individual landowners and occupiers, independent irrigation consultants / contractors should be appointed to advise on both temporary and, where necessary, permanent diversions of irrigation mains to 	<p>The Applicant has had productive and continuing discussions with the respondent with regards to the maintenance of irrigation systems during construction and any necessary pre or post construction works required to the respective irrigation systems.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
	ensure that throughout the construction period SPR maintain water supplies to any areas severed by the works, to ensure that all land previously capable of irrigation remains so.	
009	<p>FLOOD ISSUES</p> <p>No details have been provided to landowners and occupiers on how any increase in surface water run off from the haul road and the temporary working areas will be managed and dissipated during the construction period.</p>	There is a commitment to produce a Surface Water and Drainage Management Plan as part of the Outline Code of Construction Practice (APP-578) submitted as part of the Application. The Surface Water and Drainage Management Plan will be made available when it is possible to do so.
010	<p>DUST</p> <p>Clarification is required on how practical issues, like dust, will be controlled during the construction period.</p>	<p>An Air Quality Management Plan (AQMP) is required to be included within the Code of Construction Practice (CoCP) which must be submitted to the Local Planning Authority for approval prior to commencement of the works. The AQMP will detail control measures to manage dust and emission during construction works. This matter has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 2 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding air quality.</p>
011	<p>ACCESS</p> <p>If the DCO is confirmed, defined routes of access for pre-construction works, the construction works and post construction remedial works and maintenance will need to be agreed with individual landowners and occupiers.</p>	The Applicant has had productive and continuing discussions with the respondent with regards to the appropriate routes of access and egress.
012	It is noted that no detail has, to date, been provided to landowners and occupiers as to how they will access land severed by the construction works, which will need to be agreed prior to the commencement of the work.	Upon confirmation of the detailed design, the Applicant will work constructively with landowners, occupiers and their representatives with regards to access to severed land.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
013	<p>RESTRICTIONS</p> <p>It is accepted that over the easement width, it would be inappropriate to construct permanent buildings or facilities that would impinge on SPR's ability to access the cables. However, such restrictions should not extend to semi-permanent works, such as the construction of areas of hardstanding (for storage or parking purposes) and / or tracks undertaken using hardcore and other loose fill material. It is essential that the areas of land subject to any permanent restrictions as a result of the Project are kept to a minimum.</p>	<p>The Applicant has had productive and continuing discussions with the respondent with regards to carrying out works as described.</p> <p>It should be noted that the Statement of Reasons (APP-026) advises that permanent rights will be required to retain and carry out future works to the onshore cables over land of up to approximately 20m in width. This would alter where construction processes or other reasons necessitate permanent rights being required over a wider area (i.e. where trenchless techniques is utilised or unexpected engineering difficulties occur) or, as mentioned, where the maximum width of land required is reduced to 16.1m.</p> <p>The requirement for permanent rights over land of approximately 20m in width is justified on the basis that there would be up to six electrical cables, two fibre optic cables and two distributed temperature sensing cables, laid in two trenches within this permanent corridor with sufficient spacing between cable trenches to ensure thermal separation, in addition to room for any operation and maintenance works. The width of the land over which permanent rights are sought is comparable with similar schemes.</p>
014	<p>DEPTH OF CABLES</p> <p>We note from the OCoCP, that the onshore cables will typically be laid in trenches approximately 1200mm below ground level. To date, landowners and occupiers have been advised that there will be a restriction on the depth to which cultivations can be undertaken without prior approval from SPR of 650mm which is insufficient. Taking account of the prevailing soil type, i.e. light sandy soil, the geographical location of the cable route (close to the East Coast) then it is considered that there is a high propensity for 'wind blow' to be a significant factor over the anticipated life of the Project. To this end, the proposed typical depth of 1200mm is considered insufficient and that as a minimum, the cables</p>	<p>Onshore cables will typically be installed in trenches approximately 1.2m below ground level and of approximate 0.9m width. This depth would allow the cables (and protective tiles and tape) to be laid below the level of typical field drainage pipes and other underground services to minimise impact and interaction.</p> <p>The Applicant has had productive and continuing discussions with the respondent with regards to the depth of agricultural activities over the cables.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

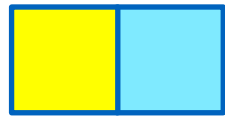
No.	Relevant Representation	Applicant's Comments
	should be laid at a depth of 1500mm. Increasing the depth of the cables, will also enable the restriction on cultivation depth (without prior approval) to be increased to 950mm.	
015	<p>WORKING HOURS</p> <p>The proposed working hours within the OCoCP, of 7.00am to 7.00pm, Monday to Friday and 7.00am to 1.00pm on Saturday's, with no construction works on Sundays or Bank Holidays, are acceptable and should be confirmed in the DCO to enable enforcement. There should be no exceptions other than in response to emergency situations.</p>	<p>The acceptability of the working hours is noted.</p> <p>Exceptions to these working hours for the works are described in section 6.9 Onshore Programme of Chapter 6 Project Description (APP-054), for the onshore substation these include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the ES, such as concrete pouring, dewatering, cable pulling, cable jointing and trenchless technique; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>For the National Grid infrastructure, these exemptions include:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; • Fitting out works associated with the National Grid substation; • The completion of construction activities commenced during the approved working hours which cannot safely be stopped; • The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>Working hours are secured through Requirement 23 and Requirement 24 of the draft DCO (APP-023) and will be signposted within the final Code of Construction Practice prepared post-consent to discharge Requirement 22 of the draft DCO (APP-023). The final Code of Construction Practice must accord with the Outline Code of Construction Practice (APP-578) submitted with the Application, which provides detail on working hours within section 3.1.</p>
016	<p>CONSTRUCTION MITIGATION MEASURES</p> <p>We note from the OCoCP, that noise and vibration management measures are to be implemented during the construction period and brief details of these have been provided. We would ask that as a minimum, more detailed consideration of physical mitigation measures that could be undertaken during the construction period to minimise disturbance to local residents are considered, including strategic banking of topsoil to form an acoustic bund.</p>	<p>Noise and vibration during construction has also been raised in other Relevant Representations and a topic response has been prepared:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Of particular relevance to the query raised by the respondent, please see the extract below:</p> <p>"Construction phase noise will be controlled through the production of a Construction Phase Noise and Vibration Management Plan post-consent, which is to be submitted to and approved by the local planning authority in advance of construction works commencing, as part of the Code of Construction Practice secured under Requirement 22 of the draft DCO (APP-023). The specific control measures set out within the Construction Phase Noise and Vibration Management Plan will be complied with during the construction phase. Best practice noise mitigation measures, to be implemented and controlled through the Construction Phase Noise and Vibration Management Plan (in relation to the installation of the onshore cable route), will typically include:</p> <ul style="list-style-type: none"> Management of construction operating hours;



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> • Use of screens and noise barriers / acoustic screens; • Construction site layout to minimise or avoid reversing with use of banksmen where appropriate. Output noise from reversing alarms set at levels for health and safety compliance; • Use of modern, fit for purpose, well maintained plant and equipment to minimise noise generation. Plant and vehicles will be fitted with mufflers /silencers maintained in good working order. Use of silenced equipment, as far as possible and low impact type compressors and generators fitted with lined and sealed acoustic covers. Doors and covers housing noise emitting plant will be kept closed when machines are in use; • No audible music or radios to be played outdoors on site; • Ensuring engines are switched off when machines are idle; and • Regular communication with site neighbours to inform them of the construction schedule, and when noisy activities are likely to occur.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.26 Theresa Tollemache (RR-820)

Table 52 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
Theresa Tollemache RR-820	157	Temporary Occupation and Use	in respect of right of way

Table 53 Applicant's Comments on Theresa Tollemache's Relevant Representation

No.	Relevant Representation	Applicant Response
001	Use of unspoiled countryside with pipeline access over AONB land is wholly unacceptable.	<p>The landscape impact of the cable route construction, specifically its effect on the Estate Sandlands Landscape Character Type and AONB special qualities, is described in section 29.6.1.2 and Appendix 29.3 (APP-567) (Section 29.3.2) of Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>Significant in (EIA terms), short-term, temporary construction stage effects on the landscape/scenic quality and wildness/tranquillity special qualities of Area A (between Thorpeness, Sizewell and Leiston) of the AONB (Figure 29.3 (APP-393)) will primarily be experienced over several separate short 2-3 month periods of peak construction activity and not continuously throughout the construction phase. Over the majority of the construction stage, the relevant section of the onshore cable route will not be subject to these key construction works and the onshore cable route will primarily consist of installed infrastructure and stripped topsoil to be reinstated, during which time the effects on these AONB special qualities are considered not significant in EIA terms due to the limited construction activity. In addition, if the open cut trench methodology is selected as the appropriate method to cross the Sandlings SPA then works will be undertaken outside the breeding bird season. Works will avoid the peak usage periods of the AONB. Given its route primarily through farmland and avoiding features of natural heritage value, the construction of the onshore cable route is assessed as having not significant in EIA terms effects on the natural heritage features of the AONB.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant Response
		<p>After exiting the AONB, the onshore cable route then takes a route which runs parallel to the western edge of the AONB between Leiston and Aldringham. In this area, outside the AONB, there will be no direct effects from construction of the onshore cable route on the landscape elements/physical features of the AONB (Area B – between Thorpeness, Aldeburgh and Snape). There will be no significant in EIA terms effects on the landscape and scenic quality of the setting, relative wildness, tranquillity, natural and cultural heritage features of the AONB as a result of visibility of the construction of the onshore cable route when it is in close proximity to the AONB boundary.</p> <p>To the south of Aldringham, the onshore cable route extends west away from the coastal areas of the AONB towards the onshore substation, becoming increasingly distant from the coastal part of the AONB, while running parallel to, and approximately 1km north of the area of AONB covering the River Alde estuary. The construction of the onshore cable route over this section will have no significant effects on the special qualities of the AONB.</p> <p>The effect of the onshore cable route during construction is therefore only assessed as having significant in EIA terms, short-term and temporary effects on the character of the AONB within a localised area of the onshore cable route between Thorpeness, Sizewell and Leiston (Area A) but is assessed as not significant in EIA terms, short-term and temporary on the wider AONB within the LVIA study area (Areas B and C (between Sizewell and Dunwich Forest)).</p> <p>For further information, please see Applicant's response to comments of a similar nature:</p> <p>Please see Table 12 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape - cable route</p>
002	The substation complexes each the size of Wembley Stadium are dangerously close to a small picturesque village which is also liable to flooding.	During the process of defining the onshore substations site selection study area (section 4.9.1.2.4 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)), any areas listed as Flood Zone 3 were excluded from the search. Flood zones are defined as follows:



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant Response
		<ul style="list-style-type: none"> Flood Zone 3 is defined by Environment Agency's online Flood Map for Planning as land with a high risk of flooding; Flood zone 3a is land having a 1 in 100 or greater annual probability of river flooding or 1 in 200 of sea flooding; and Flood zone 3b is categorised as a high functional floodplain where water has to flow or be stored in times of flood (section 20.3.2 of Appendix 20.3 (APP-496). <p>As part of the RAG assessment (Appendix 4.2 (APP-443)), the following constraints relating to flood risk were considered:</p> <ul style="list-style-type: none"> Proximity to licensed abstraction points; Presence of potentially contaminated land; Source Protection Zone; and Proximity to fluvial flood risk. <p>The proposed substation location is not located in proximity to any land of Flood Zone 3 and therefore a green risk rating was assigned. Further information regarding flood risk zones is provided in section 20.5.1.4 of Chapter 20 Water Resources and Flood Risk (APP-068).</p> <p>The Applicant notes concerns relating to the substation locations and potential impacts on local flooding and surface water. The Applicant has therefore looked to address these comments in the following:</p> <p>Please see Table 25 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substation.</p> <p>Please see Table 32 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding water resources and flood risk</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant Response
		Please see Table 22 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – size of substations.
003	The noise from the Sub station will dominate their lives and from previous experience it is impossible to live with in close proximity and even up to a wider radius.	<p>The Applicant has looked to address these comments in the following:</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation</p>
004	The delays and blockages on the country roads, from up to 700 HGV per day 6 days per week) will cause untold misery to locals, the many tourists who visit the area (who contribute hugely to the local economy), farm traffic and emergency services.	<p>The Applicant notes concerns relating to HGV movements and the impact they may have on the local road network. The Applicant has therefore looked to address these comments in the following:</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport, pertinent extracts of which are set out below.</p> <p><u>Vehicle Movements</u></p> <p>Vehicle movements are stated as two way (i.e. two-way movements represent the inbound and outbound trip i.e. 100 two-way movements equate to 50 arrivals and 50 departures). Daily traffic peaks, profiled by month, are summarised in Chapter 26 - Traffic and Transport Table 26.20 & 26.21 (APP-074) and Appendix 26.2 Table A26.1 & 26.2 (APP-528) The peaks are generated by assuming worst case of full overlap of the peak period for all discrete components of the onshore infrastructure combined, namely: Landfall location; Four onshore cable route sections; National Grid Infrastructure; and Onshore Substation.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant Response
		<p>For the project alone, the peak Heavy Goods Vehicle (HGV) movements are 210 per day (i.e. 105 vehicles in and 105 vehicles out) in month 34.</p> <p>The worst case for cumulative construction of both Projects would be simultaneous construction of both projects, peak numbers are provided in Appendix 26.2 (APP-528)</p> <p>The peak Heavy Goods vehicle (HGV) movements are 270 per day (i.e. 135 vehicles in and 135 vehicles out) in month 34</p> <p><u>Driver Delay</u></p> <p>Chapter 26 - Traffic and Transport Section 26.6. 1.11 Impact 4: Driver Delay (Capacity) and section 26.6.1.12 Impact 5: Driver Delay (Highway Geometry) assess impacts relating to congestion. Embedded mitigation measures are identified to limit Driver Delay impacts to not significant as follows:</p> <ul style="list-style-type: none"> • A cable corridor haul route that reduces HGV movements on the public highway; • A booking system to enable a daily profile of deliveries to be maintained and ensure that the required deliveries are regularly forecast and planned; • Worker generated traffic reduced through car sharing; and • No roads to be fully closed to install the proposed project's cables under the public highway. <p>In addition, the Outline Construction Traffic Management Plan (OCTMP), Section 2.2.7 (APP-586) contains a 'Network Resilience' strategy to reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during planned and unplanned events. Table 2.2 sets out the measures to mitigate the impact of construction traffic on the following events:</p> <ul style="list-style-type: none"> • Sizewell B outages; • Major events on the highway (e.g. bike races, parades, etc) and public holidays; • Major incidents such as accidents on the highway; and • Incidents involving contractors, such as, breakdowns, accidents, etc.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant Response
		Embedded mitigation will be secured by the Construction Traffic Management Plan and the Traffic Plan.
005	Our precious environment famous for migrating birds and wild fowl as well as many wild animals and also the unique marsh areas, forests will be disrupted for ever.	<p>The Applicant has looked to address this comment in the following responses:</p> <p>Please see Table 19 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ornithology.</p> <p>Please see Table 18 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding onshore ecology.</p>
006	Alternative ways such as Brown field sites or the Ring main must be the alternatives as we must protect our countryside and preserve for future generations.	<p>The Applicant has looked to address this in the following responses:</p> <p>Please see Table 17 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding offshore ring main.</p> <p>Please see Table 9 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding grid connection point.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

2.27 William Gault (RR-347)

Table 54 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
William Gault RR-347	136, 137	Temporary Occupation and Use	as assumed owner (in respect of subsoil beneath half width of public highway)
	138, 142	Temporary Occupation and Use	Owner

Table 55 Applicant's Comments on William Gault's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	<p>We are very concerned about the massive disruption that this project will cause to our local community, not only in terms of road traffic, but noise, and completely upturning the lives and living standard of those people with houses within view and ear shot of the substation, this is catastrophic for them.</p> <p>Why this project can not be sited next too or near the Sizewell power stations site, where some infrastructure (roads) are already in place to coordinate a project like this, and where to disruption to the local community would have much less impact, having the sea on one side, and anyway the already disruption caused by the power stations, I simply can not understand!</p>	<p>Section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Connection and Infrastructure Options Note (CION) process and the work undertaken by the Applicant with National Grid to establish a grid connection location. The CION process considers the total life cost of the connection assessing both the capital and projected operational costs to the onshore network (over a project's lifetime) to determine the most economic and efficient design option. This is a principle driver for the location of substations. Table 4.3 provides a summary of the optioneering within this process.</p> <p>The Applicant has followed NPS EN-1, NPS EN-3, NPS EN-5 the Electricity Act 1989 and National Grid's Guidelines on Substation Siting and Design (Horlock Rules) with the following aims:</p> <ul style="list-style-type: none"> Onshore substation to be positioned as close to the existing National Grid overhead lines as possible to reduce the requirement for cabling; and Onshore substation and National Grid substation to be positioned to deliver an efficient and economic system.



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Paragraph 2.6.34 of EN-3 makes it clear that Applicant must work within the regulatory regime for offshore transmission networks established by Ofgem. The Applicant has done this and has gone through the appropriate processes for the siting of the grid connection in line with the regulatory framework.</p> <p>The initial onshore study area encompassed an area within a 1km buffer of the overhead line route into Sizewell. This was to ensure that any potential options, at a less economic and efficient distance from the overhead line, would still be captured and considered. Section 4.9.1.2.4 describes the subsequent review and refinement of this initial study area.</p> <p>Within the onshore study area, seven zones were identified as potential substation sites, based on available space to accommodate the required project (section 4.9.1.3). Additionally, a 'target' buffer of 250m from residential properties was applied as a proxy for minimising disturbance to residents.</p> <p>The seven potential substation zones were scored using a Red / Amber / Green (RAG) assessment (Appendix 4.2 (APP-443)) against criteria agreed with statutory consultees. These included archaeology / heritage, ecology, landscape, hydrology and hydrogeology, engineering, community, landscape and visual, property and planning. The RAG assessment did not identify the chosen onshore substation site, rather it was a tool that allowed a number of sites to be compared and the most acceptable sites identified at the time to progress to further assessment stages.</p> <p>The culmination of the various work streams as described in section 4.9.1.3 enabled the Applicants to decide that the substation zone northeast of Friston (Zone 7) as the proposed zone to be taken forward.</p> <p>Phase 3.5 Consultation (section 4.9.1.6 of Chapter 4 Site Selection and Assessment of Alternatives) enabled the Applicant to engage with local communities and consultees on the opportunity to consider an alternative substation site at Broom Covert, Sizewell (Zone 8) in parallel with proposals for a substation site at Grove Wood, Friston (Zone 7).</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>As set out in section 4.9.1.6., there are significant differences between the proposed onshore substations sites Grove Wood, Friston and Broom Covert, Sizewell:</p> <ul style="list-style-type: none"> • Presence of Broom Covert, Sizewell within the Suffolk Coast and Heaths AONB, contrary to NPS EN-1 and NPPF policy; presenting a significant consenting risk to the project. A suitable alternative outside the Suffolk Coast and Heaths AONB exists (Grove Wood, Friston) and therefore exceptional circumstances do not exist to site within the AONB; • The Broom Covert, Sizewell site is located within the AONB (which is contrary to the NPS EN-1 policy) and siting in the Broom Covert, Sizewell site is likely to result in significant effects on some of the special qualities of the AONB; • Significant risk of Compulsory Acquisition Powers not being available to SPR at the Broom Covert, Sizewell site (due to the proximity to Sizewell B Nuclear Power Station and Galloper Offshore Wind Farm statutory undertaker land and the use of the site as reptile mitigation land for the proposed Sizewell C New Nuclear Power Station development; • The need to secure replacement reptile mitigation land for the Sizewell C New Nuclear Power Station development on a voluntary basis, without the ability to secure land by compulsory acquisition (as land would need to be secured prior to SPR's compulsory acquisition rights being made available to allow its use by EDF); and • Additional costs incurred in laying an additional 6km cable length to Grove Wood, Friston. <p>The Broom Covert, Sizewell site presented significant policy challenges toward gaining consent which outweighed the increased cost of further cabling to the Grove Wood, Friston site. It is the Applicant's position, in accordance with policies set out in NPS EN-1 and based on extensive advice and stakeholder engagement that the</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<p>Grove Wood, Friston site offers the most appropriate option for the siting of onshore substations and National Grid infrastructure (section 4.9.1.7).</p> <p>The Applicant notes the comments made and these matters have also been raised by a number of individual representations and the Applicant has therefore prepared topic responses on these matters:</p> <p>Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.</p> <p>Please see Table 9 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding grid connection point.</p> <p>Please see Table 13 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding landscape – substations.</p> <p>Please see Table 31 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding traffic and transport.</p> <p>Please see Table 15 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – construction.</p> <p>Please see Table 16 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.</p> <p>Please see Table 29 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding socio-economics – house prices.</p>



2.28 William Reeve (RR-672)

Table 56 Relevant Plots, Nature of the IP's Interest and Rights Sought over Land

Relevant Representation Number	Plot number (s)	Rights sought	Nature of land interest
William Reeve RR-672	98	Freehold Purchase	in respect of agricultural tenancy
	108	Freehold Purchase	in respect of farm business tenancy
	109	Freehold Purchase	in respect of right of way
	105, 106, 107	Freehold Purchase	Occupier
	90	Temporary Occupation and Use	in respect of agricultural tenancy
	104	Temporary Occupation and Use and Acquisition of Permanent Rights	in respect of right of way

Table 57 Applicant's Comments on William Reeve's Relevant Representation

No.	Relevant Representation	Applicant's Comments
001	I wholeheartedly support the representations made by SASE and already made busy Friston Parish Council. In addition;	The points raised in the Relevant Representation made by SASES have been considered and are addressed in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1). The points raised in the Relevant Representation made by Friston Parish Council have also been considered and are addressed in <i>Table 9 in Applicant's Comments on Relevant Representations Volume 3</i> (document reference ExA.RR3.D0.V1).
002	1. The siting of these substations will remove over 30 acres of land from my farming operation for years to come, reducing my ability to farm by 25%.	As presented in the <i>Statement of Reasons</i> (APP-026), a DCO may include provision authorising compulsory acquisition of land and the creation of a new right as well as by the acquisition of an existing one, only if the Secretary of State is satisfied that:



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
		<ul style="list-style-type: none"> The land is required for the development to which the development consent relates; The land is required to facilitate or is incidental to that development; or The land is replacement land which is to be given in exchange for commons, open spaces etc. forming part of the Order Land. <p>The land referred to in this representation is required for the onshore cable, onshore substation, for planting and bunding works for landscaping and to install a Sustainable Drainage System and the acquisition of land to include permanent rights and temporary possession being sought are fundamental to the implementation of the Order</p>
003	2. There is an already serious flooding problem in Friston as around 600 acres of land drain through the village. A project like this will only make things worse and I do not see scope for Friston escaping serious flooding from this concrete jungle in the future.	The historic flooding issues in Friston have also been raised by a number of individual representations and the Applicant has therefore prepared a topic response on the matter. Please see Table 32 in in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding water resources and flood risk.
004	3. My agricultural work to produce food for this country, requires constant journeys on the narrow country roads round Friston already made busy by the popular tourism generated by this beautiful area. Ten or more years of extra traffic generated by the construction process will make driving around Friston very difficult and dangerous with scope for serious - possibly fatal accidents.	<p>The Applicant notes queries raised in Relevant Representations regarding road safety and the potential for increased accidents.</p> <p>Road safety is considered and assessed in sections 26.5.4 and 26.6.1.10 of Chapter 26 - Traffic and Transport (APP-074) . Collision clusters have been identified that could potentially be exacerbated by the Project's construction traffic demand. Mitigation has been identified to reduce impacts to non-significant.</p>
005	4. Noise generated from the stations sited so close, will be a permanent blight on the peaceful background we have now.	Noise issues associated with the operation of the onshore substations have been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter.

Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020



No.	Relevant Representation	Applicant's Comments
		Please see Table 16 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding noise and vibration – operation.
006	5. We have two holiday cottages in the village - one so close to the site it will be looking out on the cable corridor for the whole of the construction time. Income will suffer dramatically.	<p>The impact of the Projects on tourism has been raised by a number of individual Relevant Representations and the Applicant has therefore prepared a topic response on the matter.</p> <p>Please see Table 30 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding tourism and hospitality.</p>
007	6. SPR have failed to act in good faith throughout the process so far. They failed to show the whole of the village of Friston next to the sub-station site on an aerial shot. Obviously afraid of how close they are to the village. At this late stage for the first time it appears my main access route to the farms fields is to be used as a pre-construction route. Knowing SPR this will probably be used throughout the ten year plus construction timeline. Also given this first site could be the tip of the iceberg with further cable routes being dug to bring future projects to Friston, the inconvenience of sharing access to me farm fields with SPR could go on for ever.	<p>The Applicant notes the comments made and these matters have also been raised by a number of individual representations and the Applicant has therefore prepared topic responses on these matters:</p> <p>Please see Table 1 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding adequacy of consultation.</p> <p>Please see Table 5 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding cumulative impacts of all projects.</p> <p>Please see Table 21 in <i>Applicant's Comments on Relevant Representations Volume 2</i> (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding project description – construction strategy.</p> <p>The Applicant is seeking rights for the temporary use of plots 89, 90 and 91 for the purpose of onshore preparation works. This track is proposed to be used by non-HGV traffic and not for construction. The Applicant will not obstruct this access route.</p>



Applicant's Comments on Relevant Representations

Volume 4 Landowners: 11th June 2020

No.	Relevant Representation	Applicant's Comments
008	7. Why this whole project is being considered is an ABSOLUTE JOKE. Looking at a map a primary school pupil would say "Why not connect to the grid at Sizewell and not this ridiculous corridor to Friston". Yes, there may be wildlife protected around Sizewell but we have wildlife in Friston just as precious.	The onshore substation site selection process has also been raised by a number of individual representations and the Applicant has therefore prepared a topic response on the matter. Please see Table 26 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding site selection – onshore substations.
009	8. Further, a more adult approach to the whole energy from wind at sea being brought inland idea, needs a more countryside solution. The idea of a ring main around the coast connecting wind farms and bringing them onshore onto a few sensibly placed landfall sites seems far more sensibly than many cross land routes across rural East Anglia which will desecrate a beautiful part of the country for ever. PLEASE PLEASE PLEASE address this last issue now as once the go-ahead is given to SPR at Friston the damage will be done and you have ruined East Anglia forever. Friston does not deserve to be ignored by an ill thought through project by a company using planning rules which are failing the electrical industry.	The construction of an offshore ring main has also been raised by a number of individual representations and the Applicant has therefore prepared a topic response on the matter: Please see Table 17 in Applicant's Comments on Relevant Representations Volume 2 (document reference ExA.RR2.D0.V1) for the Applicant's comments on Relevant Representations regarding the offshore ring main.