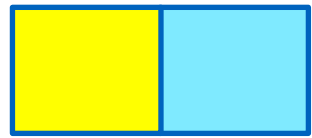




SCOTTISHPOWER  
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# East Anglia ONE North and East Anglia TWO Offshore Windfarms

## Draft Statement of Common Ground

East Suffolk Council and Suffolk  
County Council

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited  
Document Reference: ExA.SoCG-2.D1.V2  
SPR Reference: EA1N\_EA2-DWF-ENV-REP-IBR-000875

Date: 2<sup>nd</sup> November 2020  
Revision: Version 02  
Author: Royal HaskoningDHV

Applicable to **East Anglia ONE North** and **East Anglia TWO**



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	11/06/2020	Paolo Pizzolla	Ian Mackay / Julia Bolton	Rich Morris
02	02/11/2020	Paolo Pizzolla	Ian Mackay / Lesley Jamieson	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
01	n/a	n/a	First draft SoCG issued to the Examining Authority
02	n/a	n/a	Second draft SoCG issued to the Examining Authority at Deadline 1



# Table of Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
1.1	Background	1
1.2	The Development	2
1.3	Summary of Agreed, Not Agreed and Outstanding Matters	3
<b>2</b>	<b>Statement of Common Ground</b>	<b>9</b>
2.1	Ground Conditions and Contamination	9
2.2	Land Use	16
2.3	Onshore Ecology	27
2.4	Onshore Ornithology	43
2.5	Air Quality	50
2.6	Water Resources and Flood Risk	73
2.7	Archaeology and Cultural Heritage	88
2.8	Noise and Vibration	110
2.9	Traffic and Transport	132
2.10	Human Health	151
2.11	Offshore Seascape, Landscape and Visual Amenity	153
2.12	Landscape and Visual	169
2.13	Tourism, Recreation and Socio-Economics	187
<b>3</b>	<b>Signatures</b>	<b>224</b>



## Glossary of Acronyms

AIL	Abnormal Indivisible Load
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
AQMP	Air Quality Management Plan
CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
DCO	Development Consent Order
DEFRA	Department for Environment, Food and Rural Affairs
DML	Deemed Marine Licence
DMO	Destination Management Organisation
EIA	Environmental Impact Assessment
EPS	European Protected Species
ES	Environmental Statement
ESC	East Suffolk Council
ETG	Expert Topic Group
ExA	Examining Authority
FRA	Flood Risk Assessment
GEART	Guidelines for the Environmental Assessment of Road Traffic
HGV	Heavy Goods Vehicle
LVIA	Landscape and Visual Impact Assessment
MoU	Memorandum of Understanding
NG-ESO	National Grid Electricity System Operator
NOx	Nitrogen Oxides
NRMM	Non-Road Mobile Machinery
OAMP	Outline Access Management Plan
OCoCP	Outline Code of Construction Practice
OCTMP	Outline Construction Traffic Management Plan
OLEMS	Outline Landscape and Ecological Management Strategy
OTP	Outline Travel Plan
PCAEP	Pre-Commencement Archaeology Execution Plan
PD	Procedural Decision
PEIR	Preliminary Environmental Information Report
PM	Particulate Matter
PRoW	Public Right of Way
SCC	Suffolk County Council
SLVIA	Seascape, Landscape and Visual Amenity
SoCG	Statement of Common Ground
SPA	Special Protected Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
WSI	Written Scheme of Investigation



## Glossary of Terminology

Applicants	East Anglia TWO Limited / 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.
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 North 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.
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.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
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 infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Operations consisting of site clearance, demolition work, pre-planting of landscaping works, archaeological investigations, environmental surveys, ecological mitigation, investigations for the purpose of assessing ground conditions, remedial work in respect of any contamination or other adverse ground conditions, diversion and laying of services, erection of temporary means of enclosure, creation of site accesses, footpath creation, highway alterations, erection of welfare facilities and the temporary display of site notices or advertisements.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
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.



# 1 Introduction

1. This document is applicable to both the East Anglia TWO and East Anglia ONE North DCO Applications (the Applications), and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.

## 1.1 Background

2. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and East Suffolk Council (ESC) and Suffolk County Council (SCC) in relation to the East Anglia TWO project and the East Anglia ONE North project (the Projects). It identifies areas of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications) where matters are agreed or not agreed between the parties. Hereafter, ESC and SCC are collectively referred to as 'the Councils' or addressed by name where referred to individually.
3. The Applicants have had regard to the guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.
4. This SoCG has been structured to reflect topics of the Applications which are of interest to the Councils. Topic specific matters agreed, not agreed and actions to resolve matters between the Applicants and the Councils are included within this SoCG.
5. The tables presented below represent the SoCG with the Applicants and the Councils in respect of the following topics (each of which includes matters pertaining to the Environmental Impact Assessment (EIA) and DCO). SCC and ESC have agreed that each topic will be led by an individual Council as indicated below.
  - Ground Conditions and Contamination (**Table 3**) (ESC);
  - Land Use (**Table 5**) (ESC);
  - Onshore Ecology (**Table 7**) (ESC);
  - Onshore Ornithology (**Table 9**) (ESC);
  - Air Quality (**Table 11**) (ESC);
  - Water Resources and Flood Risk (**Table 13**) (SCC);
  - Archaeology and Cultural Heritage (**Table 15** and **Table 16**) (SCC);



- Noise and Vibration (**Table 18** and **Table 19**) (ESC);
  - Traffic and Transport (**Table 21**) (SCC);
  - Human Health (**Table 23**) (ESC);
  - Offshore Seascape, Landscape and Visual Amenity (SLVIA) (**Table 25**) (ESC);
  - Landscape and Visual (**Table 27**) (ESC);
  - Tourism (**Table 29**) (ESC);
  - Recreation (Public Rights of Way) (**Table 31**) (SCC); and
  - Socio-Economics (**Table 33**) (ESC).
6. Throughout the SoCG the phrase “Agreed” identifies any point of agreement between the Applicants and the Councils. The phrase “Not Agreed” identifies any point that is not yet agreed between the Applicants and the Councils.
7. The matters considered within this SoCG apply only within the context of the Councils’ statutory remit. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicants and the Councils to reach agreement on the matter wherever possible, or refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.

## 1.2 The Development

8. The key offshore components of each project will comprise:
- Offshore wind turbines and their associated foundations;
  - Offshore platforms - up to four offshore electrical platforms and their associated foundations supporting some of the windfarm’s electrical equipment, and up to one construction, operation and maintenance platform and associated foundations that may cater for personnel and activities required during the construction phase and operation and maintenance of the windfarm;
  - Sub-sea cables between the wind turbines and offshore electrical platforms (inter-array), between separate offshore platforms (platform link cables) and between offshore electrical platforms and the landfall (export cables);
  - Scour protection around foundations and on inter-array, platform link and export sub-sea cables as required; and
  - Potential for one meteorological mast and its associated foundations for monitoring wind speeds during the operational phase of the windfarm.
9. The key onshore components of each project will comprise:



- The landfall site with up to two transition bays to connect the onshore and offshore cables;
  - Up to six onshore cables, up to two fibre optic cables and up to two distributed temperature sensing cables installed underground (some or all of which may be installed in ducts) and associated jointing bays installed underground;
  - Onshore substation;
  - Electrical cable connection between the onshore substation and National Grid substation; and
  - Temporary works.
10. National Grid infrastructure will also be required to connect each project to the national electricity grid. Key components of the National Grid infrastructure which is common to both Projects will comprise:
- National Grid substation;
  - Cable sealing end compounds and a cable sealing end (with circuit breaker) compound;
  - Realignment of the existing overhead lines; including the reconstruction or replacement of up to three existing overhead pylons in proximity to the National Grid substation and the addition of up to one new pylon in close proximity to existing overhead pylons; and
  - Temporary works.

### 1.3 Summary of Agreed, Not Agreed and Outstanding Matters

11. **Table 1** provides a summary of the matters agreed, not agreed and those which are outstanding between the Applicants and the Councils for each of the relevant SoCG topic areas. For further information on matters that are outstanding / under discussion which the Applicants and the Councils are working to address during the examination period, refer to the Notes column of each table in Section 2 below.

**Table 1 Summary of Agreed, Not Agreed and Outstanding Matters**

Topic	Summary
Ground Conditions and Contamination	All matters relating to Existing Environment and Assessment Methodology have been agreed. Matters relating to the Assessment Conclusions and Mitigation currently remain under discussion.  Matters pertaining to the DCO are not yet agreed and currently remain under discussion.



Topic	Summary
Land Use	<p>All matters relating to Existing Environment and Assessment Methodology have been agreed. Matters relating to the Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p>
Onshore Ecology	<p>All matters relating to Existing Environment and Assessment Methodology have been agreed. Matters relating to the Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p> <p>With regard to other matters, the Councils' preferred construction methodology for crossing the Sandlings Special Protected Area (SPA) is an open trench technique (agreed).</p>
Onshore Ornithology	<p>All matters relating to Existing Environment, Assessment Methodology and Mitigation in the context of Onshore Ornithology have been agreed. Matters relating to the Assessment Conclusions currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p> <p>With regard to other matters, the Councils' preferred construction methodology for crossing the Sandlings SPA is an open trench technique (agreed).</p>
Air Quality	<p>All matters relating to Existing Environment have been agreed. Matters relating to the Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO currently remain under discussion.</p> <p>Other matters currently remain under discussion.</p>
Water Resources and Flood Risk	<p>Matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p>
Archaeology and Cultural Heritage	<p><b>Onshore Archaeology</b></p> <p>All matters relating to the Assessment Methodology have been Agreed. Matters relating to the Existing Environment, Assessment Conclusions and Mitigation remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p>



Topic	Summary
	<p><b>Setting of Heritage Asset</b></p> <p>Matters relating to Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not considered relevant to this topic.</p>
Noise and Vibration	<p><b>Operation Phase</b></p> <p>Matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO and Other Matters are not yet agreed and currently remain under discussion.</p> <p><b>Construction Phase</b></p> <p>All matters relating to Existing Environment have been agreed. Matters relating to the Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p>
Traffic and Transport	<p>All matters relating to Existing Environment have been agreed. Matters relating to the Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO, <b>Outline Construction Traffic Management Plan (OCTMP)</b> (APP-586), <b>Outline Travel Plan (OTP)</b> (APP-588) and <b>Outline Access Management Plan (OAMP)</b> (APP-587) currently remain under discussion.</p> <p>Matters relating to operational Abnormal Indivisible Load (AIL) routes remain under discussion.</p>
Human Health	<p>All matters relating to human health remain under discussion. The matters agreed, not agreed and outstanding for human health have not been included within this SoCG for the reasons set out within <b>Section 10</b>.</p>
Offshore Seascape, Landscape and Visual Amenity	<p>All matters relating to Existing Environment have been agreed.</p> <p>Matters relating to the Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p>



Topic	Summary
Landscape and Visual	<p>Matters relating to Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p>
Tourism	<p>Matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO have not been identified.</p> <p>Other matters currently remain under discussion</p>
Recreation (Public Rights of Way (PRoW))	<p>Matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation currently remain under discussion.</p> <p>Matters pertaining to the DCO are not yet agreed and currently remain under discussion.</p> <p>All other matters regarding funding for inspections, the Code of Construction Practice (CoCP) and fencing and other means of enclosure have been agreed.</p>
Socio-Economics	<p>All matters relating to Existing Environment, Assessment Methodology and Mitigation have been agreed. Matters relating to the Assessment Conclusions currently remain under discussion.</p> <p>All parties consider that matters pertaining to the DCO are not applicable to this topic.</p>

12. A number of tables within **Section 2** of this SoCG include the Councils' and Applicants' respective positions on the Cumulative Impact Assessment (CIA), as presented below:

- The Councils understand that National Grid Electricity System Operator Limited (NG-ESO) has offered grid connections to a number of potential future projects, namely the Nautilus Interconnector; the Eurolink Interconnector and the Galloper Extension (now known as the Five Estuaries) and that further connection offers are likely to be made to the Greater Gabbard extension. The Councils understanding is that these projects would connect to the new National Grid substation proposed at Grove Wood, Friston for which the Applicants are seeking consent, and that these future connections would result in the enlargement or extension of the National Grid substation. The Councils maintain that these future energy projects should



be included in the Projects' CIA. While full information may not yet be available, the Councils believe that NG-ESO is likely to be able to provide information on the effects of further grid connections on the National Grid Infrastructure proposed at Grove Wood, Friston, which should be incorporated into certain topics of the Projects' CIA. The Councils' note the non-statutory guidance provided by the Planning Inspectorate in Advice Note 17, setting out a process that applicants "may wish to adopt" for cumulative effects assessment, but do not consider it justifies the approach taken by the Applicants. Whilst the division of projects into tiers is not, in itself, a concern, Advice Note 17 does not advise that projects in Tier 3 should be left unassessed. It advises that for projects in Tier 3 "the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a high level" (paragraph 3.4.3). The Councils' concern is that there are known future energy projects planned in the general vicinity, based on the offered grid connections, and it would be possible to undertake some form of assessment in relation to them for inclusion in the CIA.

- The Applicant's position on this matter is set out in detail within ***Applicant's Comments on Relevant Representations, Volume 3: Technical Stakeholders*** (AS-036). In summary, the Applicant's approach to the CIA follows Planning Inspectorate Advice Note 17 and uses a three tier system as proposed in this Advice Note to consider what projects to include within the Projects' CIA:
  - **Tier 1:** Projects under construction, permitted or submitted applications;
  - **Tier 2:** Projects on the Planning Inspectorate's Programme of Projects where a scoping report has been submitted; and
  - **Tier 3:** Projects on the Planning Inspectorate's Programme of Projects where a scoping report has not been submitted; projects identified in the relevant Development Plan (and emerging Development Plans); and projects identified in other plans and programmes (as appropriate) which set out the framework for future development consent.

Tier 1 and Tier 2 projects are included in all relevant CIAs within the Applicants' 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. Following the guidance in Advice Note 17, the projects below were not considered in the CIA because at the time the Projects' 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):

- Nautilus Interconnector;
- EuroLink Interconnector;



- Greater Gabbard Offshore Windfarm Extension (now known as North Falls); and
- Galloper Offshore Windfarm Extension (now known as Five Estuaries).

Each of the above projects will require its own EIA and consent application and as part of that will need to undertake a cumulative assessment which reflects the development status of the Projects.

DRAFT



## 2 Statement of Common Ground

13. A summary of the consultation undertaken to date with the Councils and the matters agreed or not agreed between the Applicants and the Councils (based on discussions and information exchanged between the Applicants and the Councils during the pre-application and examination phases of the applications) are set out below for each of the SoCG topic areas.

### 2.1 Ground Conditions and Contamination

14. The Projects have the potential to impact upon ground conditions and cause contamination. **Chapter 18 Ground Conditions and Contamination** of the Environmental Statement (ES) (APP-066) provides an assessment of the significance of these impacts.
15. **Table 2** provides an overview of consultation undertaken with the Councils regarding ground conditions and contamination. Further details on the stakeholder engagement process for ground conditions and contamination can be found in the **Consultation Report** (APP-029).

**Table 2 Summary of consultation with the Councils regarding ground conditions and contamination**

Date	Contact Type	Topic
<b>Pre-Application</b>		
26 <sup>th</sup> April 2018	Meeting	Method statement, Projects update and approach to the assessment (methodology, impacts, data collection, etc.).
29 <sup>th</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the Preliminary Environmental Information Report (PEIR).
<b>Post-Application</b>		
18 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
5 <sup>th</sup> October 2020	Meeting	SoCG workshop

16. **Table 3** presents the matters agreed or not agreed between the Applicants and the Councils in relation to ground conditions and contamination.



Table 3 Ground Conditions and Contamination

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-00.01	Existing Environment	The desk-based survey presented within the assessment is an appropriate approach to establishing the existing environment.	Agreed	Agreed	Agreed	Agreed	None
LA-00.02	Existing Environment	Sufficient survey data has been collected to inform the assessment and an intrusive resource assessment is not considered to be required at this stage.	Agreed	Agreed	Agreed	Agreed	The Applicants will prepare a Materials Management Plan post-consent, detailing methods to quantify construction-generated wastes and its potential reuse, to discharge Requirement 22 of the <b>draft DCO</b> (APP-023). Results of pre-construction ground investigation surveys will inform whether such minerals will be used.
LA-00.03	Existing Environment	The ES adequately characterises the baseline environment in terms of ground conditions and contamination based on the desktop study to date.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-00.04	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-00.05	Assessment Methodology	The realistic worst case scenario for one project, in terms of largest development footprint as set out in <b>Table 18.1, Chapter 18 Ground Conditions and Contamination</b> (APP-066) and utilised in the ground conditions and contamination impact assessment is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-00.06	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-00.07	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented for one project are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-00.08	Assessment Conclusions	The assessment of cumulative impacts between East Anglia ONE North and East Anglia TWO are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-00.09	Assessment Conclusions	The assessment of cumulative impacts with future projects are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Council's and Applicant's position on the CIA.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-00.10	Mitigation	The embedded mitigation set out within Section 18.3.3 and Section 18.3.4 of the ES (APP-066) is appropriate and sufficient in terms of ground conditions and contamination, particularly in avoiding impacts upon the Thorpeness County GeoSite.	Agreed	Agreed	Agreed	Agreed	None
LA-00.11	Mitigation	Sufficient and appropriate measures are proposed within the ES and Outline Code of Construction Practice ( <b>OCoCP</b> ) (APP-578) for the management (including reuse) of excavated materials on site where possible during the construction phase.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants will update the <b>OCoCP</b> (APP-578) to add measures associated with the investigation, assessment and remediation of contaminated land in areas of potential concern prior to construction works commencing (in line with Environment Agency's 2020 Land Contamination, Risk Management Framework). The updated <b>OCoCP</b> (APP-578) will reference all relevant standards and will be submitted into the Examination at Deadline 3.</p> <p>The Councils will review their position on this statement following the update of the <b>OCoCP</b> (APP-578).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Draft Development Consent Order</b>							
LA-00.12	Wording of Requirement(s)	The wording of Requirement 22 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a CoCP for the mitigation and monitoring of potential impacts on ground conditions and contamination is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants will update the <b>OCoCP</b> (APP-578) to ensure that the Pollution Prevention and Response Plan, prepared under Requirement 22 of the <b>draft DCO</b> (APP-023) includes protocols for dealing with unexpected contamination during construction.</p> <p>The updated <b>OCoCP</b> (APP-578) will also be updated to outline the protocol to be followed in the event that contaminated land within the onshore cable corridor is identified prior to commencement of construction.</p> <p>The updated <b>OCoCP</b> (APP-578) will be submitted to Examination at Deadline 3.</p> <p>The Councils will review their position on this statement following the update of the <b>OCoCP</b> (APP-578).</p>
LA-00.13	Wording of Requirement(s)	The wording of Requirement 18 provided within the <b>draft DCO</b> (APP-023) with reference to ‘a written scheme to mitigate the potential for release of contaminants’	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants will review and update (if required) the <b>OCoCP</b> (APP-578) to refer to the latest relevant guidance at the time of writing (i.e. BS10175:2011+A2:2017 and Environment</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		which includes an investigation and assessment report and the implementation of mitigation measures, is appropriate and adequate.					<p>Agency 2020 Land Contamination Risk Management Framework).</p> <p>The Applicants will confirm in the <b>OCoCP</b> (APP-578) a commitment to consult with the appropriate regulators (the relevant planning authority and the Environment Agency) in advance of the commencement of construction regarding the remediation of contaminated land (if any).</p> <p>The updated <b>OCoCP</b> (APP-578) will be submitted to Examination at Deadline 3.</p> <p>The Councils will review their position on this statement following the update of the <b>OCoCP</b> (APP-578).</p>
<b>Other Matters as Required</b>							
N/A							



## 2.2 Land Use

17. The Projects have the potential to impact upon land use. **Chapter 21 Land Use** of the ES (APP-069) provides an assessment of the significance of these impacts.
18. **Table 4** provides an overview of consultation undertaken with the Councils regarding land use. Further details on the stakeholder engagement process for land use can be found in the **Consultation Report** (APP-029).

Table 4 Summary of consultation with the Councils regarding land use

Date	Contact Type	Topic
Post-Application		
25 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
24 <sup>th</sup> July 2020	Meeting	SoCG Meeting 2

19. **Table 5** presents the matters agreed or not agreed between the Applicants and the Councils in relation to land use.

**Table 5 Land Use**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-01.01	Existing Environment	Sufficient desk-based survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-01.02	Existing Environment	The ES adequately characterises the baseline environment in terms of land use.	Agreed	Agreed	Agreed	Agreed	None
LA-01.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-01.04	Assessment Methodology	The realistic worst case scenario for one project, in terms of the largest development footprint as set out in <b>Table 21.2 Chapter 21 Land Use</b> (APP-069) and	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		utilised in the land use impact assessment is appropriate.					
LA-01.05	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-01.06	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented for one project are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils seek clarification as to why the significance of the impact on permanent and temporary changes to land use is based on its regional level and not site level (i.e. the high magnitude impact at a local level has not been presented within the assessment given the definitions set out within <b>Table 21.8, Chapter 21</b> of the ES (APP-069)).</p> <p>The Applicants will provide a <b>Land Use Clarification Note</b> on this matter which will be submitted to the Examination (document reference ExA.AS-11.D1.V1) at Deadline 1. The clarification note confirms that significance of the impact on permanent and temporary changes to local land use was incorrectly presented as ‘minor’ adverse within the ES and corrects this ‘major’ adverse. It is noted that the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							impact conclusions for regional-level land use impacts remain as presented in <b>Chapter 21</b> of the ES (APP-069) and that the correction to the local-level impact conclusions does not materially affect the primary mitigation identified.
LA-01.07	Assessment Conclusions	The assessment of cumulative impacts between East Anglia TWO and East Anglia ONE North is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils seek clarification as to why the significance of the impact on permanent and temporary changes to land use is based on its regional level and not site level (i.e. the high magnitude impact at a local level has not been presented within the assessment given the definitions set out within <b>Table 21.8, Chapter 21</b> of the ES (APP-069)).</p> <p>The Applicants will provide a <b>Land Use Clarification Note</b> on this matter which will be submitted to the Examination (document reference ExA.AS-11.D1.V1) at Deadline 1. The clarification note confirms that significance of the impact on permanent and temporary changes to local land use was incorrectly presented as ‘minor’ adverse within the ES and corrects this ‘major’ adverse. It is noted that the impact conclusions for regional-level land use impacts remain as presented in <b>Chapter 21</b> of</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							the ES (APP-069) and that the correction to the local-level impact conclusions does not materially affect the primary mitigation identified.
LA-01.08	Assessment Conclusions	The assessment of cumulative impacts with future projects is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Council's and Applicants' position on the CIA.</p>
LA-01.09	Assessment Conclusions	The Projects minimise impacts to the best and most versatile land.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils consider that the onshore substations have been sited on the best and most versatile agricultural land in the context of National Policy Statement EN-1 (paragraph 5.10.8). The Councils do not agree that the Applicants have minimised, or provided sufficient commitment to minimise, the footprints of the onshore substations or</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>National Grid infrastructure to the maximum reasonable extent. The Councils request that a clear commitment is provided within the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) to reduce the onshore substation footprint.</p> <p>The Applicants note that whilst there are aspects of the design which will be subject to further consultation and approval, the DCO authorises the Projects within specified parameters (secured by Requirement 12 of the <b>draft DCO</b> (APP-023)) and it is not appropriate for all such parameters to be subject to uncertainty associated with the requirement for further approvals.</p>
LA-01.10	Mitigation	The embedded mitigation set out within <b>Section 21.3.3</b> and <b>Section 21.3.4</b> of the ES (APP-069) is appropriate and sufficient.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree that the Applicants have minimised or provided sufficient commitment to minimise, the footprints of the onshore substations or National Grid infrastructure to the maximum reasonable extent. The Councils request that a clear commitment is provided within the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) to reduce the onshore substation footprint.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>The Applicants note that whilst there are aspects of the design which will be subject to further consultation and approval, the DCO authorises the Projects within specified parameters and it is not appropriate for all such parameters to be subject to uncertainty associated with the requirement for further approvals.</p> <p>The Councils consider that the construction of Projects simultaneously could reduce impacts on land use. Given the Projects share the same onshore order limits and consents are being applied for at the same time, the Councils have requested a commitment from the Applicants on construction timings (i.e. commitment to simultaneous construction rather than sequential).</p> <p>The Applicants reiterate that the Projects are separate commercial entities and may be developed on different timelines depending on the financing and delivery strategy adopted. Each project must also bear its own construction cost. Whilst the delivery of the Projects in parallel remains an option, it is not</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>possible to commit to parallel construction at this stage.</p> <p>The Councils have requested a commitment to maintain access to agricultural land during construction to avoid isolating parcels of land to ensure the best use of available resources and minimise socio-economic impacts during construction.</p> <p>The Applicants consider this to be a commercial matter with the landowners. Routeing of the onshore cable corridor has been undertaken to (amongst other factors) minimise sterilisation of agricultural land. Where access to agricultural land is not available, the landowner shall be compensated under the appropriate mechanism.</p>
LA-01.11	Mitigation	The approach to undertake pre-construction land surveys (i.e. to record details of crop regimes, position and condition of field boundaries, existing drainage and access arrangements, and private water supplies) is appropriate.	Agreed	Agreed	Agreed	Agreed	<p>Whilst agreed on this statement, the Councils have requested clarification on timings and the process of pre-construction land surveys and subsequent reinstatement.</p> <p>The Applicants advise that it is not possible to confirm the timings of land surveys undertaken as onshore preparation works under the <b>draft DCO</b> (APP-023), as they will be dependent on</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							the final construction programme of the Projects and the extent to which surveys have been undertaken prior to the award of the DCO under voluntary agreements with relevant land owners. Whilst the Applicants are unable to confirm the timings at this stage, they will advise the Councils prior to the undertaking of any such surveys.
LA-01.12	Mitigation	The production of a Soil Management Plan as a sub-document of the CoCP is an appropriate approach to mitigate impacts to soil quality arising from the construction of the onshore infrastructure.	Agreed	Agreed	Agreed	Agreed	<p>The Councils seek clarification as to how the Soil Management Plan will relate to the onshore preparatory works. The Councils require confirmation that other plans drafted to manage onshore preparation works will address soil management within them.</p> <p>Onshore preparation works with a potential for significant impact on soil will be subject to appropriate soil management controls which will be documented within the relevant method statement prepared for the onshore preparation works.</p>
Draft Development Consent Order							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-01.13	Wording of Requirement(s)	The wording of Requirement 22 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a CoCP for the mitigation and monitoring of potential impacts on land use is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The onshore preparation works are not subject to the provisions within the CoCP.</p> <p>The Councils consider that onshore preparation works should be subject to the same provisions as the CoCP (Requirement 22 of the <b>draft DCO</b> (APP-023)).</p> <p>The Applicants do not consider this to be necessary given the provisions already within the <b>draft DCO</b> (APP-023) relating to the production of a Pre-Commencement Archaeology Execution Plan (Requirement 19) and a written Ecological Management Plan (Requirement 21(2)) for onshore preparation works, and the nature of the remaining onshore preparation works.</p>
LA-01.14	Wording of Requirement(s)	The onshore preparation works in relation to their impacts upon land use (including soil management) are subject to an appropriate and proportionate level of control via Requirement 16, Requirement 19 and	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils are concerned that Requirements 16 and 19 of the <b>draft DCO</b> (APP-023) only relate to highway accesses and archaeology and Requirement 21 seeks to protect ecology. There are a number of preparation works would not be caught by these requirements. The Councils seek clarification as to how the measures to mitigate the impacts on land use (e.g. pre-construction land surveys,</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		Requirement 21(2) of the <b>draft DCO</b> (APP-023).					<p>management of invasive species and land drainage measures) provided in the CoCP, will be secured for the preparation works.</p> <p>The Applicants do not consider further controls on 'onshore preparation works' to be necessary given the provisions already within the <b>draft DCO</b> (APP-023) relating to the production of a Pre-Commencement Archaeology Execution Plan (Requirement 19) and a written Ecological Management Plan (Requirement 21(2)) for onshore preparation works, and the nature of the remaining onshore preparation works.</p> <p>The Applicants are of the position that the onshore preparation works falling outside the controls applied through Requirements 16, 19 and 21 of the <b>draft DCO</b> (APP-023) do not warrant formal controls through the DCO given works such as pre-construction land surveys are anticipated to be low-impact, temporary and small-scale in extent.</p>
Other Matters as Required							
N/A							



## 2.3 Onshore Ecology

20. The Projects have the potential to impact upon onshore ecology. **Chapter 22 Onshore Ecology** of the ES (APP-070) provides an assessment of the significance of these impacts.
21. **Table 6** provides an overview of consultation undertaken with the Councils regarding onshore ecology. Further details on the stakeholder engagement process for onshore ecology can be found in the **Consultation Report** (APP-029).

**Table 6 Summary of consultation with the Councils regarding onshore ecology**

Date	Contact Type	Topic
<b>Pre-Application</b>		
20 <sup>th</sup> February 2018	Meeting	Assessment study area, outline ecological survey methodology and requirements
27 <sup>th</sup> April 2018	Meeting	Method statement, Projects update and approach to the assessment (methodology, impacts, data collection, etc.)
5 <sup>th</sup> November 2018	Meeting	Early presentation of assessment, impacts and mitigation in advance of publication of the PEIR
25 <sup>th</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
9 <sup>th</sup> May 2019	Meeting	Updates on the pre-application ecological survey requirements
<b>Post-Application</b>		
17 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
4 <sup>th</sup> August 2020	Meeting	SoCG Meeting 2
7 <sup>th</sup> October 2020	Meeting	SoCG workshop

22. **Table 7** presents the matters agreed or not agreed between the Applicants and the Councils in relation to onshore ecology.

**Table 7 Onshore Ecology**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-02.01	Existing Environment	Sufficient desk-based European protected species (EPS) survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-02.02	Existing Environment	Sufficient desk-based habitat survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-02.03	Existing Environment	Sufficient EPS field survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	The Councils agree with this statement on the basis that features unable to be surveyed were assessed using a worst case assumption as described in <b>Chapter 22 Onshore Ecology</b> (APP-070).
LA-02.04	Existing Environment	Sufficient habitat field survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-02.05	Existing Environment	The ES adequately characterises the baseline	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		environment in terms of species, particularly European Protected Species.					
LA-02.06	Existing Environment	The ES adequately characterises the baseline environment in terms of onshore habitats.	Agreed	Agreed	Agreed	Agreed	None
LA-02.07	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects upon receptors including the Sandlings SPA / Leiston-Aldeburgh Site of Special Scientific Interest (SSSI).	Agreed	Agreed	Agreed	Agreed	None
LA-02.08	Assessment Methodology	The assessment identifies and appraises appropriate techniques for crossing the Sandlings SPA and Leiston-Aldeburgh SSSI.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-02.09	Assessment Methodology	The realistic worst case scenario for one project, in terms of the largest development footprint as set out in <b>Table 22.3, Chapter 22 Onshore Ecology</b> (APP-070) and utilised in the onshore ecology impact assessment, is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-02.10	Assessment Methodology	The worst case scenario, in terms of the Sandlings SPA / Leiston-Aldeburgh SSSI crossing methodology adopted, presented in <b>Table 22.3, Chapter 22 Onshore Ecology</b> (APP-070) of the ES is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-02.11	Assessment Conclusions	The ES adequately assesses the impacts, both magnitude and temporal, on: <ul style="list-style-type: none"> <li>• Arable habitats;</li> <li>• Grassland habitats;</li> <li>• Coastal habitats;</li> </ul>	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		<ul style="list-style-type: none"> <li>Watercourses and ponds;</li> <li>Great crested newts; and</li> <li>Reptiles.</li> </ul>					
LA-02.12	Assessment Conclusions	The ES adequately assesses the impacts, both magnitude and temporal, on bats during construction.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The growth rates of mitigation planting presented within <b>section 29.2.7.3</b> of <b>Appendix 29.2</b> (APP-566) and which underpin the assessment of impacts upon bats are not agreed by the Councils.</p> <p>Through the design of the onshore cable corridor and the detail design process, the Applicants' will limit the severance of hedgerows where possible. The Applicants agree to the use of hurdles or similar methods on completion of construction to maintain links between hedgerow gaps to enable foraging, maintain commuting routes and for insects (food source for bats) to be encouraged. Such measures will be captured within an updated <b>Outline Landscape and Ecological Management Strategy (OLEMS)</b> (APP-584).</p> <p>The Applicants are also considering additional dynamic landscape management measures at the onshore substation location which will assist in promoting growth of landscape</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							planting which will also be to the benefit of bats.
LA-02.13	Assessment Conclusions	The period selected for hedgerows to be restored to their target condition is appropriate.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The growth rates of mitigation planting presented within <b>section 29.2.7.3, Appendix 29.2</b> (APP-566) and which underpin the assessment of impacts upon hedgerows are not agreed by the Councils.</p> <p>Through the design of the onshore cable corridor and the detail design process, the Applicants' will limit the severance of hedgerows where possible.</p> <p>Details of management measures will be set out within the Landscape Management Plan secured under Requirement 14 of the <b>draft DCO</b> (APP-023) which will accord with the <b>OLEMS</b> (APP-584), and in respect of which an updated version will be submitted at Deadline 3.</p>
LA-02.14	Assessment Conclusions	The assessment of impacts on woodlands and trees is appropriate and sufficient.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	The growth rates of mitigation planting presented within <b>section 29.2.7.3, Appendix 29.2</b> (APP-566) and which underpin the



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>assessment of impacts upon woodlands and trees are not agreed by the Councils.</p> <p>The Applicants do not agree with the Councils position the relevance of growth rates for the mitigation of impacts on woodland and trees.</p> <p>Details of management measures will be set out within the Landscape Management Plan secured under Requirement 14 of the <b>draft DCO</b> (APP-023) which will accord with the <b>OLEMS</b> (APP-584), and in respect of which an updated version will be submitted at Deadline 3.</p>
LA-02.15	Assessment Conclusions	The assessment of impacts on designated sites from Nitrogen Oxides (NO <sub>x</sub> ) emissions is appropriate and sufficient.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The Applicants will provide further clarification on the assessment of ecological impacts arising from Non-Road Mobile Machinery (NRMM), as well as NO<sub>x</sub> and nutrient nitrogen deposition arising from haul road construction vehicle movements. This information will be provided at Deadline 3.</p> <p>The Councils have requested this additional information and will review the clarification note once provided and update their position.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-02.16	Assessment Conclusions	The assessment of impacts on designated sites from acid deposition is appropriate and sufficient.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The Applicants will provide further clarification on the assessment of ecological impacts arising from NRMM, as well as NO<sub>x</sub> and nutrient nitrogen deposition arising from haul road construction vehicle movements. This information will be provided at Deadline 3.</p> <p>The Councils have requested this additional information and will review the clarification note once provided and update their position.</p>
LA-02.17	Assessment Conclusions	The assessment of construction noise effects on ecological receptors is appropriate and sufficient.	Agreed	Agreed	Agreed	Agreed	None
LA-02.18	Assessment Conclusions	The assessment of operational noise effects on ecological receptors is appropriate and sufficient.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The Applicants will undertake a review / assessment of the potential for impacts on sensitive ecological receptors (e.g. bats, birds) arising from predicted day-time and night-time operational noise levels at the onshore substations. This review / assessment will be submitted at Deadline 3.</p> <p>The Councils have requested this additional information and will review the clarification note once provided and update their position.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-02.19	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-02.20	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented for the Projects are appropriate.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	Please refer to the notes made at statements LA-02.12, LA-02.13, LA-02.14, LA-02.15, LA-02.16 and LA-02.18. This statement may be agreed once these preceding statements have been agreed.
LA-02.21	Assessment Conclusions	The assessment of cumulative impacts between the East Anglia ONE North project and East Anglia TWO project is appropriate.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	Please refer to the notes made at statements LA-02.12, LA-02.13, LA-02.14, LA-02.15, LA-02.16 and LA-02.18. This statement may be agreed once these preceding statements have been agreed.
LA-02.22	Assessment Conclusions	The assessment of cumulative impacts with future projects is appropriate.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.  The Applicants consider that the assessment of cumulative impacts of other existing and



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							potential future projects is robust and follows Planning Inspectorate Advice Note 17.  See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.
LA-02.23	Mitigation	The mitigation presented within the <b>OLEMS</b> (APP-584), and stated within the assessment, represents an ecological enhancement when compared with the existing ecological baseline at the substations site.	Agreed	Agreed	Not agreed - under discussion	Not agreed - under discussion	The Applicants' position is that Biodiversity Net Gain is not applicable to Nationally Significant Infrastructure Projects (NSIPs) and marine developments. This is confirmed in the UK Government's response to DEFRA consultation on Net Gain*. The Applicants have provided an <b>Ecological Enhancement Clarification Note</b> at Deadline 1 (document reference ExA.AS-16.D1.V1).  The Councils have requested further information regarding the ecological enhancements and how they have been calculated to demonstrate a genuine gain and will review the clarification note once provided and update their position.

\* [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/819823/net-gain-consult-sum-resp.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf)



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-02.24	Mitigation	The embedded mitigation and monitoring for bats, set out within <b>section 22.3.3</b> and <b>section 22.3.4</b> of the ES (APP-070), is appropriate and sufficient.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The growth rates of mitigation planting presented within <b>section 29.2.7.3, Appendix 29.2</b> (APP-566) and which underpin the assessment of impacts upon bats are not agreed by the Councils.</p> <p>Through the design of the onshore cable corridor and the detail design process, the Applicants' will limit the severance of hedgerows where possible. The Applicants agree to the use of hurdles or similar methods on completion of construction to maintain links between hedgerow gaps to enable foraging, maintain commuting routes and for insects (food source for bats) to be encouraged. Such measures will be captured within an updated <b>OLEMS</b> (APP-584) which will be submitted at Deadline 3.</p>
LA-02.25	Mitigation	The embedded mitigation and monitoring for hedgerows, set out within <b>section 22.3.3</b> and <b>section 22.3.4</b> of the ES (APP-070) is appropriate and sufficient.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The growth rates of mitigation planting presented within <b>section 29.2.7.3, Appendix 29.2</b> (APP-566) and which underpin the assessment of impacts upon hedgerows are not agreed by the Councils.</p> <p>Through the design of the onshore cable corridor and the detail design process, the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>Applicants' will limit the severance of hedgerows where possible.</p> <p>Details of management measures will be set out within the Landscape Management Plan secured under Requirement 14 of the <b>draft DCO</b> (APP-023) which will accord with the <b>OLEMS</b> (APP-584), and in respect of which an updated version will be submitted at Deadline 3.</p>
LA-02.26	Mitigation	The embedded mitigation and monitoring for woodlands and trees, set out within <b>section 22.3.3</b> and <b>section 22.3.4</b> of the ES (APP-070) is appropriate and sufficient.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The growth rates of mitigation planting presented within <b>section 29.2.7.3, Appendix 29.2</b> (APP-566) and which underpin the assessment of impacts upon woodlands and trees are not agreed by the Councils.</p> <p>The Applicants are considering additional dynamic landscape management measures at the onshore substation location which will assist in promoting growth of landscape planting.</p> <p>The Applicants are considering how the planting at the onshore substation location will be managed during the operational phase and will update this SoCG in due course.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-02.27	Mitigation	<p>The embedded mitigation and monitoring for:</p> <ul style="list-style-type: none"> <li>• Arable habitats;</li> <li>• Grassland habitats;</li> <li>• Coastal habitats;</li> <li>• Watercourses and ponds; and</li> <li>• Great crested newts.</li> </ul> <p>as set out in the ES (APP-070) is appropriate and sufficient.</p>	Agreed	Agreed	Agreed	Agreed	None
<b>Draft Development Consent Order</b>							
LA-02.28	Wording of Requirement(s)	<p>The wording of Requirement 14 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a written landscape management plan and associated work programme for the mitigation and monitoring of potential</p>	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The Councils have requested clarification regarding the long-term management of Work No.24 and the utilisation of dynamic landscape management measures.</p> <p>The Applicants are considering the management period for Work No. 24 and will provide further details at Deadline 3.</p> <p>The Applicants are also considering additional dynamic landscape management measures at</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		landscape and visual effects is appropriate and adequate.					the onshore substation location which will assist in promoting growth of landscape planting.
LA-02.29	Wording of Requirement(s)	The wording of Requirement 21 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of an Ecological Management Plan for the mitigation and monitoring of potential impacts to onshore ecology is appropriate and adequate.	Agreed	Agreed	Not Agreed - under discussion	Not Agreed - under discussion	<p>The Applicants note that pre-construction ecological surveys will inform each Ecological Management Plan (and Breeding Bird Protection Plan) produced under Requirement 21 of the <b>draft DCO</b> (APP-023).</p> <p>For clarity, Requirement 21(1) will be amended to:</p> <p><i>21.—(1) No stage of the onshore works may commence until for that stage a written ecological management plan (which accords with the outline landscape and ecological management strategy) reflecting <del>the</del> survey results and <del>the</del> ecological mitigation measures included in the environmental statement and including-</i></p> <p><i>(a) a breeding bird protection plan;</i></p> <p><i>(b) an arboricultural method statement;</i></p> <p><i>(c) an invasive species method statement; and</i></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p><i>(d) where appropriate, a special protection area crossing method statement has been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body.</i></p> <p>The Applicants are considering how the planting at the onshore substation location will be managed during the operational phase and will update this SoCG in due course.</p>
LA-02.30	Wording of Requirement(s)	The scope of the pre-construction surveys included within the Outline Landscape and Ecological Management Strategy (referenced in Requirement 21 of the <b>draft DCO</b> (APP-023)) is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-02.31	Wording of Requirement(s)	The onshore preparation works in relation to their impacts upon onshore ecology, are subject to an appropriate and proportionate level of control via	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Requirement 21 of the <b>draft DCO</b> (APP-023).					
<b>Other Matters as Required</b>							
LA-02.32	Construction Methodology	An open cut trench construction methodology is the preferred approach for the crossing of the Sandlings SPA.	Agreed	Agreed	Agreed	Agreed	<p>An <b>Outline SPA Crossing Method Statement</b> (document number ExA.AS-3.D1.V1) will be submitted to the Examination at Deadline 1.</p> <p>The Councils have provided comments to the Applicants on a draft Outline SPA Crossing Method Statement and will confirm their position on reviewing the final <b>Outline SPA Crossing Method Statement</b> submitted at Deadline 1.</p>



## 2.4 Onshore Ornithology

23. The Projects have the potential to impact upon onshore ornithology. **Chapter 23 Onshore Ornithology** of the ES (APP-071) provides an assessment of the significance of these impacts.
24. **Table 8** provides an overview of consultation undertaken with the Councils regarding onshore ornithology. Further details on the stakeholder engagement process for onshore ornithology can be found in the **Consultation Report** (APP-029).

**Table 8 Summary of consultation with the Councils regarding onshore ornithology**

Date	Contact Type	Topic
<b>Pre-Application</b>		
20 <sup>th</sup> February 2018	Meeting	Assessment study area, outline ecological survey methodology and requirements
27 <sup>th</sup> April 2018	Meeting	Method statement, Projects update and approach to the assessment (methodology, impacts, data collection, etc.)
5 <sup>th</sup> November 2018	Meeting	Early presentation of assessment, impacts and mitigation in advance of publication of the PEIR
25 <sup>th</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
9 <sup>th</sup> May 2019	Meeting	Updates on the pre-application ecological survey requirements
<b>Post-Application</b>		
17 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
4 <sup>th</sup> August 2020	Meeting	SoCG Meeting 2
7 <sup>th</sup> October 2020	Meeting	SoCG workshop

25. **Table 9** presents the matters agreed or not agreed between the Applicants and the Councils in relation to onshore ornithology.



Table 9 Onshore Ornithology

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-03.01	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-03.02	Assessment Methodology	The ES adequately characterises the baseline environment in terms of onshore ornithology.	Agreed	Agreed	Agreed	Agreed	None
LA-03.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-03.04	Assessment Methodology	The realistic worst case scenario for one project, in terms of the largest development footprint as set out in <b>Table 23.3, Chapter 23 Onshore Ornithology</b> (APP-071) and utilised in the onshore ornithological impact assessment, is appropriate.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-03.05	Assessment Methodology	The worst case scenario, in terms of the Sandlings SPA / Leiston-Aldeburgh SSSI crossing construction methodology adopted, presented in <b>Table 23.3, Chapter 23 Onshore Ornithology</b> (APP-071) of the ES is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-03.06	Assessment Methodology	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-03.07	Assessment Conclusions	The assessment of impacts for construction and decommissioning presented for the Projects are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-03.08	Assessment Conclusions	The assessment of impacts for operation phase at the Projects' onshore substations presented for the Projects are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants will produce a clarification note presenting an assessment of ornithological impacts arising from day-time and night-time operational noise at the onshore substations. This clarification note will be submitted to the Examination at Deadline 3.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-03.09	Assessment Conclusions	The assessment of cumulative impacts between the East Anglia ONE North project and East Anglia TWO project is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants will produce a clarification note presenting a review / assessment of the potential for impacts on sensitive ornithological receptors arising from predicted day-time and night-time operational noise levels at the onshore substations. This clarification note will be submitted to the Examination at Deadline 3.
LA-03.10	Assessment Conclusions	The assessment of cumulative impacts with future projects is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-03.11	Mitigation	The embedded mitigation and monitoring set out within <b>section 23.3.3</b> and <b>section 23.3.4</b> of the ES (APP-071) is appropriate and sufficient.	Agreed	Agreed	Agreed	Agreed	None
<b>Draft Development Consent Order</b>							
LA-03.12	Wording of Requirement(s)	The wording of Requirement 21 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of an Ecological Management Plan (including the Breeding Bird Protection Plan) for the mitigation and monitoring of potential impacts to onshore ornithology is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants note that pre-construction ornithological surveys will inform each Ecological Management Plan (and Breeding Bird Protection Plan) produced under Requirement 21 of the <b>draft DCO</b> (APP-023).</p> <p>For clarity, Requirement 21(1) will be amended to:</p> <p><i>21.—(1) No stage of the onshore works may commence until for that stage a written ecological management plan (which accords with the outline landscape and ecological management strategy) reflecting <del>the</del> survey results and <del>the</del> ecological mitigation measures included in the environmental statement and including-</i></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>(a) a breeding bird protection plan;</p> <p>(b) an arboricultural method statement;</p> <p>(c) an invasive species method statement; and</p> <p>(d) where appropriate, a special protection area crossing method statement</p> <p>has been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body.</p>
LA-03.13	Wording of Requirement(s)	The scope of the pre-construction surveys included within <b>OLEMS</b> (APP-584) (referenced in Requirement 21 of the <b>draft DCO</b> (APP-023)) is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-03.14	Wording of Requirement(s)	The onshore preparation works in relation to their impacts upon onshore Ornithology are subject to an appropriate and proportionate level of control via Requirement 21(2) of the <b>draft DCO</b> (APP-023).	Agreed	Agreed	Agreed	Agreed	Onshore preparation works in relation to their impacts upon onshore Ornithology will be controlled through an Ecological Management Plan secured through Requirement 21(2) of the <b>draft DCO</b> (APP-023).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Other Matters as Required</b>							
LA-03.15	Construction methodology	An open cut trench construction methodology is the preferred approach for the crossing of the Sandlings SPA.	Agreed	Agreed	Agreed	Agreed	<p>An <b>Outline SPA Crossing Method Statement</b> (document number ExA.AS-3.D1.V1) will be submitted to the Examination at Deadline 1.</p> <p>The Councils have provided comments to the Applicants on a draft Outline SPA Crossing Method Statement and will confirm their position on reviewing the final <b>Outline SPA Crossing Method Statement</b> submitted at Deadline 1.</p>



## 2.5 Air Quality

26. The Projects have the potential to impact upon air quality. **Chapter 19 Air Quality** of the ES (APP-067) provides an assessment of the significance of these impacts.
27. **Table 10** provides an overview of consultation undertaken with the Councils regarding air quality. Further details on the stakeholder engagement process for air quality can be found in the **Consultation Report** (APP-029).

**Table 10 Summary of consultation with the Councils regarding air quality**

Date	Contact Type	Topic
<b>Pre-Application</b>		
26 <sup>th</sup> April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
29 <sup>th</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
9 <sup>th</sup> May 2019	Meeting	Refinement and agreement of assessment methodology
<b>Post-Application</b>		
18 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
27 <sup>th</sup> July 2020	Meeting	SoCG Meeting 2
7 <sup>th</sup> October 2020	Meeting	SoCG workshop

28. **Table 11** presents the matters agreed or not agreed between the Applicants and the Councils in relation to air quality.



Table 11 Air Quality

ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-04.01	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-04.02	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project upon receptors including the Stratford St Andrew Air Quality Management Area (AQMA) except with regards the risk of cumulative impacts with the proposed Sizewell C (SZC) development which is discussed in LA-04.15.	Agreed	Agreed	Agreed	Agreed	None
LA-04.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants have submitted an <b>Air Quality Clarification Note</b> to Examination (document reference ExA.AS-20.D1.V1) at Deadline 1. This clarification note will be updated with a quantitative assessment of the impact of NRMM on ecological



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		potential impacts of the project upon ecological receptors.					receptors and will be submitted to Examination at Deadline 3.
LA-04.04	Assessment Methodology	The assessment has been undertaken with consideration of the appropriate relevant guidance.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils agree with this statement subject to establishing agreement on LA-04.03.
LA-04.05	Assessment Methodology	The decision to screen out Works No. 35, 36 and 37 from the air quality assessment is appropriate and reasonable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The decision to scope out the highway alterations from the air quality impact assessment was due to significantly fewer construction vehicle movements being associated with these works compared with the rest of the onshore works at the landfall, onshore cable route and onshore substations. The Applicants believe that an assessment of construction traffic movements associated with Works Nos. 35, 36 and 37 would not change the conclusions presented within <b>Chapter 26</b> of the ES (APP-074).</p> <p>The Applicants have submitted an <b>Air Quality Clarification Note</b> (document reference ExA.AS-20.D1.V1) to Examination at Deadline 1 which</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							addresses the potential for air quality impacts to arise as a result of these works.  The Councils will review this clarification note submitted at Deadline 1 and confirm their position on this statement.
LA-04.06	Assessment Methodology	The assessment adequately assesses air quality impacts from vehicles displaced/rerouted as a result of Works No. 35, 36 and 37.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils consider that the assessment of impacts should cover re-routed traffic and haul road construction traffic. Particular areas of concern for effects from re-routing are Leiston, Saxmundham and Yoxford due to street canyon features present.</p> <p>The Applicants have submitted an <b>Air Quality Clarification Note</b> (document reference ExA.AS-20.D1.V1) to Examination at Deadline 1 which addresses this matter.</p> <p>The Councils will review this clarification note submitted at Deadline 1 and confirm their position on this statement.</p>
LA-04.07	Assessment Methodology	The decision to scope out project alone operation phase	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		air quality impacts is reasonable and appropriate.					
LA-04.08	Assessment Methodology	The decision to scope out cumulative operation phase air quality impacts is reasonable and appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-04.09	Assessment Methodology	The year in which construction is anticipated to commence and that was adopted for the air quality assessment (2023, as per the Traffic and Transport assessment) represents an appropriate approach.	Agreed	Agreed	Agreed	Agreed	None
LA-04.10	Assessment Methodology	The model verification process adopted within the assessment is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-04.11	Assessment Methodology	The assessment gives sufficient and appropriate consideration to NRMM.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants have submitted an <b>Air Quality Clarification Note</b> to Examination (document reference ExA.AS-20.D1.V1) at Deadline 1. This clarification note will be updated with a quantitative assessment of the impact of NRMM on ecological



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							receptors and will be submitted to Examination at Deadline 3.  The Councils will review this clarification note once it has been received and provide any relevant update to the Examining Authority.
LA-04.12	Assessment Methodology	The air quality assessment based on the worst case traffic flows as presented within <b>Chapter 26 Traffic and Transport</b> of the ES (APP-074), and therefore represents an assessment of the worst case air quality impacts.	Agreed	Agreed	Agreed	Agreed	This matter has been addressed within the <b>Air Quality Clarification Note</b> (document reference ExA.AS-20.D1.V1) submitted to Examination at Deadline 1.
LA-04.13	Assessment Methodology	The cumulative air quality assessment is based on the worst case traffic flows (i.e. East Anglia TWO and East Anglia ONE North constructed simultaneously) as presented within <b>Chapter 26 Traffic and Transport</b> of the ES (APP-074), and therefore represents	Agreed	Agreed	Agreed	Agreed	A discrepancy in the worst case traffic flows was resolved in the <b>Air Quality Clarification Note</b> (document reference ExA.AS-20.D1.V1) submitted to Examination at Deadline 1.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		an assessment of the worst case air quality impacts.					
LA-04.14	Assessment Methodology	The worst case scenario (in terms of the construction programme and construction phase dust emissions) presented in the assessment is appropriate.	Agreed	Agreed	Agreed	Agreed	A range of mitigation measures available for the Projects has been proposed within <b>Chapter 19 – Air Quality</b> (APP-067).  Impacts from construction can be offset with specific and appropriate mitigation which will be agreed with the local authority as part of the approved CoCP (secured under Requirement 22 of the <b>draft DCO</b> (APP-023)). At this stage, the specific mitigation to be implemented has not been specified or agreed.
LA-04.15	Assessment Methodology	The approach to assessing cumulative air quality impacts with the proposed SZC project is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils consider that the Applicants should commit to entering a Construction Traffic Management Group with suitable controls and monitoring of construction traffic and air quality (see LA-04.31) as there is a concern regarding risk to the annual mean NO <sub>2</sub> air quality objective in Stratford St Andrew as a consequence of the cumulative construction traffic. The Applicants are considering this request.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Applicants are reviewing SZC's DCO application material to identify whether any overlap of construction programme will arise (including Works Nos. 35, 36 and 37) and will provide a clarification at Deadline 2.</p> <p>The Councils will review this clarification note once it has been received and provide any relevant update to the Examining Authority.</p>
LA-04.16	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of background pollutant concentrations.	Agreed	Agreed	Agreed	Agreed	None
LA-04.17	Assessment Conclusions	The results presented within the ES in terms of NO <sub>x</sub> concentrations at ecological receptors are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants have submitted an <b>Air Quality Clarification Note</b> to Examination (document reference ExA.AS-20.D1.V1) at Deadline 1. This clarification note will be updated with a quantitative assessment of the impact of NRMM on ecological receptors and will be submitted to Examination at Deadline 3.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The Councils will review this clarification note once it has been received and provide any relevant update to the Examining Authority.
LA-04.18	Assessment Conclusions	The results of NO <sub>2</sub> , PM <sub>10</sub> and PM <sub>2.5</sub> concentration modelling at human receptors within the assessment are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-04.19	Assessment Conclusions	The ES identifies the appropriate receptors of potential air quality impacts, comprising the relevant AQMAs and ecological receptor sites.	Agreed	Agreed	Agreed	Agreed	The Applicants confirm that the Port Travel Plan (secured under Requirement 36 of the <b>draft DCO</b> (APP-023)) will incorporate an assessment of potential air quality impacts associated with the Projects contribution to port traffic during construction.  The Applicants will submit an Outline Port Travel Plan to Examination at Deadline 3.
LA-04.20	Assessment Conclusions	The assessment of impacts for construction and operation for the Projects alone and the Projects together (cumulatively) presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants have submitted an <b>Air Quality Clarification Note</b> to Examination (document reference ExA.AS-20.D1.V1) at Deadline 1. This clarification note will be updated with a quantitative assessment of the impact of NRMM and haul road heavy goods vehicle (HGV) movements on



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>ecological receptors and will be submitted to Examination at Deadline 3.</p> <p>The Councils note that not all points raised by the Councils have been addressed by the Applicants in the Projects' assessment methodologies. However, these outstanding points have been reviewed and will not alter the study conclusions. These outstanding points and reasons why these are considered not to affect the conclusions are presented below:</p> <ol style="list-style-type: none"> <li>1. Environmental Transport Meeting Group 26/4/18. ESC asked if materials currently stockpiled at SZC would be used, and whether there is potential to re-use material. This is not significant for this assessment as the source of materials for the Projects do not determine significance of air quality impacts. It is the handling of materials and mitigation which informs significance. Impacts due to HGV movements are addressed elsewhere.</li> <li>2. Environmental Transport Meeting Group 29/1/19. ESC raised concerns</li> </ol>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>about higher dust impacts from the haul road and spoil heaps due to sandy soil. In addition, that lessons learnt from the East Anglia ONE project will be reviewed. However, neither the composition of the soil nor East Anglia ONE's lessons learnt have been addressed within the assessment. This is not significant as the Applicants and Councils will be able to address this with mitigation in the final CoCP prepared post-consent.</p> <p>3. Pre-application discussions included assessment of acid-based soils, haul crossing of cross-country tracks and study area to match the traffic and transport assessment. Haul routes will be assessed by the Applicants in an Air Quality Clarification Note submitted at Deadline 1. Mitigation for acid based soils can be addressed in the CoCP.</p> <p>4. Roads included in the traffic assessment but excluded from the air quality assessment are not sensitive to changes in air quality. Therefore, this</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>will not alter conclusions already reached in this assessment.</p> <p>The Applicants have submitted an <b>Air Quality Clarification Note</b> (document reference ExA.AS-20.D1.V1) to Examination at Deadline 1, which confirms that item 2 above has been considered within the submitted <b>OCoCP</b> (APP-578) and the mitigation measures presented within <b>Chapter 19 Air Quality</b> (APP-067). The Councils will review this note and <b>OCoCP</b> (APP-578) to determine whether concerns regarding dust mitigation have been fully addressed.</p>
LA-04.21	Assessment Conclusions	The assessment of impacts for construction and operation presented for cumulative impacts with SZC are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils consider that the Applicants should commit to entering a Construction Traffic Management Group with suitable controls and monitoring of construction traffic and air quality (see LA-04.31) as there is a concern regarding risk to the annual mean NO <sub>2</sub> air quality objective in Stratford St Andrew as a consequence of the cumulative construction traffic. The Applicants are considering this request.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Applicants are reviewing SZC's DCO application material to identify whether any overlap of construction programme will arise and will provide a clarification at Deadline 2. Potential cumulative traffic and transport impacts with SZC will also be assessed within this clarification note.</p> <p>The Councils will review this clarification note once it has been received and provide any relevant update to the Examining Authority.</p>
LA-04.22	Assessment Conclusions	The assessment of impacts for construction and operation presented are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-04.23	Assessment Conclusions	The assessment conclusions of cumulative impacts between East Anglia ONE North and East Anglia TWO are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils consider that the Applicants should commit to entering a Construction Traffic Management Group with suitable controls and monitoring of construction traffic and air quality (see LA-04.31). The Applicants are considering this request.</p> <p>The Councils consider that the assessment methodology is acceptable. However, there is not agreement with the Applicants' conclusions. The emission sensitivity test</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>results presented within Appendix 19.4 cumulative scenario 1 should have also been considered when drawing conclusions. This shows that, if governmental projections in fleet improvements are not realised, resulting in higher than anticipated emissions from HGVs and future baseline levels, there is a risk the annual mean NO<sub>2</sub> air quality objective could be exceeded in Stratford St Andrew.</p> <p>The Applicants do not agree that the emissions sensitivity test results presented within <b>Appendix 19.4</b> should be considered within the conclusions, given that evidence published in February 2020 by Air Quality Consultants which states that vehicle emissions factors within the version 9.0 of Defra's Emissions Factors Toolkit are robust with respect to predicting emissions from vehicles up until 2030.</p>
LA-04.24	Assessment Conclusions	The assessment conclusions of cumulative impacts between the Projects and the	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils consider that the Applicants should commit to entering a Construction Traffic Management Group with suitable controls and monitoring of construction



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		proposed SZC development are appropriate.					<p>traffic and air quality (see LA-04.31), as there is a concern regarding risk to the annual mean NO<sub>2</sub> air quality objective in Stratford St Andrew as a consequence of the cumulative construction traffic. The Applicants are considering this request.</p> <p>The Applicants are reviewing SZC's DCO application material to identify whether any overlap of construction programme will arise and will provide a clarification at Deadline 2. Potential cumulative traffic and transport impacts with SZC will also be assessed within this clarification note.</p>
LA-04.25	Assessment Conclusions	The assessment conclusions of cumulative impacts between future projects is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.
LA-04.26	Mitigation	The embedded mitigation set out within <b>Section 19.3.4</b> and <b>Section 19.3.5</b> of the ES is appropriate, sufficient and commensurate with the scale of the project's impacts.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils consider that the Applicants should commit to entering a Construction Traffic Management Group with suitable controls and monitoring of construction traffic and air quality (see LA-04.31). There is a concern regarding risk to the annual mean NO <sub>2</sub> air quality objective in Stratford



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>St Andrew if air quality improvements forecast for 2023 are not realised and also as a consequence of the cumulative construction traffic. The Applicants are considering this request.</p> <p>The Applicants confirm that the <b>OCTMP</b> (APP-586) and <b>OTP</b> (APP-588) will be updated. The updated <b>OCTMP</b> (APP-586) and <b>OTP</b> (APP-588) will include controls and monitoring to limit traffic flows to that assessed within <b>Chapter 26 Traffic and Transport</b> (APP-074), and these updated outline plans will provide detail on how such controls will be implemented in practice and will be submitted to Examination at Deadline 3.</p> <p>The Councils advise that sufficient detail will need to be provided by the Applicants to confirm how controls will be implemented in practice.</p>
LA-04.27	Mitigation	The embedded mitigation, including production of an Air Quality Management Plan	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants will update the <b>OCocP</b> (APP-578) at Deadline 3 to identify specific areas of sensitivity within the onshore development area where specific mitigation measures may be implemented. The



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		(AQMP), is appropriate to control wind-blown dust.					relevant planning authority must approve the final CoCP.  The Councils will review their position once the <b>OCoCP</b> (APP-578) has been updated.
LA-04.28	Mitigation	The mitigation measures proposed with regard to stockpile management and the control of dust are appropriate and sufficient.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants will update the <b>OCoCP</b> (APP-578) to identify specific areas of sensitivity within the onshore development area where specific mitigation measures may be implemented. The relevant planning authority must approve the final CoCP.  The Councils will review their position following update of the <b>OCoCP</b> (APP-578) which will provide further detail regarding which measures will be adopted in specific locations.
<b>Draft Development Consent Order</b>							
LA-04.29	Wording of Requirement(s)	The wording of Requirement 22 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a CoCP for	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils agree with the principle and intention of the CoCP secured by Requirement 22 but query how the Applicants' Air Quality Management Plan secured under <b>draft DCO</b> (APP-023) Requirement 22 relates to the Construction



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		the mitigation and monitoring of potential impacts on air quality (including dust) is appropriate and adequate.					<p>Traffic Management Plan (CTMP) secured under <b>draft DCO</b> Requirement 28.</p> <p>The Councils would like the air quality management plan section within the <b>OCoCP</b> (APP-578) pre-consent to include the following:</p> <ol style="list-style-type: none"> <li>1. CTMP and a Construction Traffic Management Group to monitor traffic and ensure no significant impacts on the Stratford St Andrew AQMA.</li> <li>2. Support for provision of air quality monitoring in Stratford St Andrew to enable impacts to be managed.</li> <li>3. Fencing and seeding stockpiles is proposed although screening is preferable. Where alternatives to fencing are recommended the Applicants should agree this with the relevant planning authority.</li> <li>4. Facilitation of dust monitoring in response to complaints regarding dust nuisance received by Councils.</li> <li>5. Additional mitigation measures which may be required in the light of the Air Quality Clarification Note findings.</li> </ol>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							At this stage the Applicants are unable to commit to site-specific mitigation as the Projects' detail design has not been completed but will update the <b>OCoCP</b> (APP-578) with a commitment to identify specific areas of sensitivity within the onshore development area where specific measures may be implemented.
LA-04.30	Wording of Requirement(s)	The wording of Requirement 36 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a Port Travel Plan for the management of traffic and access is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants confirm that the Port Travel Plan (secured under Requirement 36 of the <b>draft DCO</b> (APP-023) will incorporate an assessment of potential air quality impacts associated with the Projects contribution to port traffic during construction.</p> <p>The Applicants will submit an Outline Port Travel Plan to Examination at Deadline 3.</p> <p>The Councils will review their position once the Outline Port Travel Plan has been submitted.</p>
Other Matters as Required							



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-04.31	Monitoring	The proposed monitoring of the construction traffic and plant fleet for compliance with the Euro Class and Emissions standards, as set out within section 10 and section 13 of the <b>OCoCP</b> (APP-578), is appropriate and sufficient.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils consider that the Applicants should commit to entering a Construction Traffic Management Group with suitable controls and monitoring of construction traffic and air quality (see LA-04.31). There is a concern regarding risk to the annual mean NO<sub>2</sub> air quality objective in Stratford St Andrew if air quality improvements forecast for 2023 are not realised and also as a consequence of the cumulative construction traffic. The Applicants are considering this request.</p> <p>The Applicants note that the principles for reporting HGV movements are set out within <b>Section 4.2</b> of the <b>Outline CTMP</b> (APP-586). The Applicants confirm that the <b>Outline CTMP</b> (APP-586) and <b>Outline Travel Plan</b> (APP-588) will include controls and monitoring to limit traffic flows to that assessed within <b>Chapter 26 Traffic and Transport</b> (APP-074), and these outline plans will provide detail on how such controls will be implemented in practice and will be submitted to Examination at Deadline 3.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-04.32	Monitoring	Establishing a Construction Traffic Management Group comprising representatives from East Anglia TWO, East Anglia ONE North, SZC and the ESC to share information on peak construction and delivery periods to assist in identifying possible cumulative air quality issues is an appropriate and adequate approach to monitoring cumulative air quality matters.	Not Agreed – under discussion	Not Agreed – under discussion	Agreed	Agreed	<p>The Councils stated that entering into a communication group would resolve concerns in relation to LA-04.15, LA-04.21, LA-04.23, LA-04.24, LA-04.26 and LA-04.31 and potentially lead to agreement on these statements (where not already agreed).</p> <p>The Applicants are considering this request.</p>
LA-04.33	Monitoring	Establishing a financial agreement with the Councils for the monitoring of air quality during the construction phase is an appropriate and adequate approach to monitoring cumulative air quality emission concentrations.	Not Agreed – under discussion	Not Agreed – under discussion	Agreed	Agreed	<p><b>Chapter 19</b> (APP-491) indicates a range of potential impacts during construction of the Projects from insignificant (assuming official fleet and emissions projections come to fruition) to significant (if they do not come to fruition).</p> <p>SCC consider it important to review trends in background air quality (i.e. non project related emissions) as there is a significant risk to the AQMA if forecast improvements in these are not realised. Real time monitoring within the AQMA and suitable</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							controls on construction traffic, supported by active management via a Construction Traffic Management Group would be an acceptable approach to managing these potential impacts.  The Applicants are currently reviewing this request.
LA-04.34	Onshore preparation works	There is no assessment of onshore preparation works upon local air quality or dust nuisance. Onshore preparation works are defined within the <b>draft DCO</b> (APP-023) as ' <i>means operations consisting of site clearance, demolition work, pre-planting of landscaping works, archaeological investigations, environmental surveys, ecological mitigation, investigations for the purpose of assessing ground conditions, remedial work in respect of any contamination or other adverse ground conditions, diversion and</i>	Not Agreed – under discussion	Not Agreed – under discussion	Agreed	Agreed	The Applicants confirm that vehicle trips associated with onshore preparation works are less than vehicle trips generated during construction, as outlined in <b>Air Quality Appendix 19.3</b> (APP-492). As a result, the Councils agree that no further assessment of vehicle emissions is required.  The Councils consider the activities which have the potential for substantial dust nuisance include:  <ol style="list-style-type: none"> <li>1. Site clearance</li> <li>2. Demolition work</li> <li>3. Remedial work for contaminated land or adverse ground conditions</li> <li>4. Highway alterations</li> </ol> The Councils advised that proposed mitigation for dust nuisance should be submitted to the Councils in advance of the



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		<i>laying of services, erection of temporary means of enclosure, creation of site accesses, footpath creation, highway alterations, erection of welfare facilities and the temporary display of site notices or advertisements'</i>					<p>above mentioned onshore preparation works to agree it is sufficient to offset impacts.</p> <p>The Applicants consider that the activities associated with onshore preparation works are typically minor in nature and can normally be undertaken outside the planning regulatory framework. The <b>draft DCO</b> (APP-023) ensures appropriate controls are in place when undertaking highway alterations (Requirement 16), archaeological investigations (Requirement 19) and creation of site accesses (Article 13).</p>



## 2.6 Water Resources and Flood Risk

29. The Projects have the potential to impact upon water resources and flood risk. **Chapter 20 Water Resources and Flood Risk** of the ES (APP-068) provides an assessment of the significance of these impacts.
30. **Table 12** provides an overview of consultation undertaken with the Councils regarding water resources and flood risk. Further details on the stakeholder engagement process for water resources and flood risk can be found in the **Consultation Report** (APP-029).

**Table 12 Summary of consultation with the Councils regarding water resources and flood risk**

Date	Contact Type	Topic
<b>Pre-Application</b>		
27 <sup>th</sup> April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
7 <sup>th</sup> November 2018	Meeting	High-level presentation of assessment, impacts and mitigation in advance of publication of the PEIR
2 <sup>nd</sup> May 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR and agreements on methodology
<b>Post-Application</b>		
24 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
26 <sup>th</sup> June 2020	Meeting	SoCG Meeting 2
25 <sup>th</sup> September 2020	Written Correspondence	Applicants issued updated SoCG to Councils for comment
9 <sup>th</sup> October 2020	Written Correspondence	Councils provided comments on SoCG

31. **Table 13** presents the matters agreed or not agreed between the Applicants and the Councils in relation to water resources and flood risk.



Table 13 Water Resources and Flood Risk

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-05.01	Existing Environment	The desk-based review undertaken at the time of preparing the assessment is an appropriate approach to establishing the existing environment.	Agreed	Agreed	Agreed	Agreed	<p>The Councils accept this statement but note that the October 2019 flooding events in the Friston area occurred 19 days prior to submission of the Applications.</p> <p>The Applicants note that given this time frame, they were unable to acknowledge this flooding event within <b>Chapter 20 Water Resources and Flood Risk</b> (APP-068) of the ES.</p>
LA-05.02	Existing Environment	The desk-based review presented within the assessment is appropriate at the time of preparing this SoCG.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Friston Surface Water Management Plan<sup>†</sup> became available in June 2020 which could potentially add further detail to the baseline description of surface water flow patterns and flood risk at the onshore substations and National Grid infrastructure locations presented within the ES and Flood Risk Assessment (FRA). The Councils therefore cannot agree to this until the baseline has been reviewed and updated, where appropriate.</p>

<sup>†</sup> The Friston Surface Water Management Plan was commissioned by Suffolk County Council and comprises a suite of documents including Friston Flood Study Report (BMT, 2020) and Friston Surface Water Study – Technical Report (BMT, 2020), along with associated modelling documents and figures.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The Applicants have reviewed the Friston Surface Water Management Plan and have incorporated the relevant findings into the <b>Outline Operational Drainage Management Plan</b> , to be submitted at Deadline 3.
LA-05.03	Existing Environment	At the time of submitting the Applications, the ES and FRA adequately characterise the baseline environment in terms of water resources and flood risk.	Agreed	Agreed	Agreed	Agreed	None
LA-05.04	Existing Environment	At the time of preparing this SoCG, the ES and FRA adequately characterise the baseline environment in terms of water resources and flood risk.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Friston Surface Water Management Plan became available in June 2020 which could potentially add further details to the baseline description of surface water flow patterns and flood risk at the onshore substation presented within the ES and FRA. The Councils therefore cannot agree to this until the baseline has been reviewed and updated, where appropriate.</p> <p>The Applicants have reviewed the Friston Surface Water Management Plan and have incorporated the relevant findings into the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<b>Outline Operational Drainage Management Plan</b> , to be submitted at Deadline 3.
LA-05.05	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	<p>The Councils agreed with this statement subject to a commitment from the Applicants to undertake appropriate infiltration testing pre-construction and provide sufficient information, prior to consent, to demonstrate that there is sufficient space within the Order Limits to accommodate infiltration features with a worst case infiltration rate of 10mm/hr and an appropriate factor of safety and demonstrate there is sufficient space within the Order Limits for attenuation features at an agreed discharge rate with an appropriate factor of safety. Both of the above should be demonstrated whilst complying with current guidance for Sustainable Drainage Systems (SuDS) design.</p> <p>The Applicants note the Councils caveat that this statement is only agreed if the commitments can be met by the Applicants, if the commitments are not met then this statement will need to be revised to 'Not Agreed'. The Applicants will provide evidence in support of the above within an Illustrative</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Infiltration SuDS Design Clarification Note to be submitted at Deadline 2. The <b>Outline Operational Drainage Management Plan</b> (to be submitted to the Examinations at Deadline 3) will provide further details of the above design requirements.
LA-05.06	Existing Environment	Flood events in the Friston area, resulting from overland flow, that occurred during late 2019 – early 2020 was a result of multiple flow paths and not a direct result of surface water runoff from land associated with the proposed site of the onshore substation or the National Grid infrastructure.	Agreed	Agreed	Agreed	Agreed	None
LA-05.07	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Friston Surface Water Management Plan became available in June 2020 following submission of the Applications, but the Councils note that this statement is made in respect of the assessment methodologies adopted for <b>Chapter 20 Water Resources and Flood Risk</b> (APP-068) of the ES.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Councils position is based on the lack of assessment on human receptors in Friston, linked specifically to the watercourse located in Friston and its associated catchment (not at a location downstream with a larger catchment). The potential impact of 'increased sediment supply' &amp; 'changes to surface water runoff and flood risk' during both construction and operation phases are reliant on primary mitigation. A receptor should not be excluded from assessment based on primary mitigation. The deliverability of said mitigation is yet to be demonstrated for both the construction and operation phases.</p> <p>The Applicants confirm that the approach to scope out human receptors from the assessment was due to the Applicants' commitment to not increase flood risk downstream of the substation sites catchment from the discharge point to the Friston Watercourse.</p> <p><b>Section 5.1</b> of the <b>OCoCP</b> (APP-578) describes the measures which will be in place to protect surface and groundwater and prevent contaminants such as sediment</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							release from entering the surrounding environment.
LA-05.08	Assessment Methodology	The worst case scenario presented in the assessment as set out in <b>Table 20.2</b> of the ES (APP-068) is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils expect all impermeable areas to be accounted for within the worst-case scenario and queried whether the impermeable surface of the basins themselves is included within the worst case scenario. The Councils understand that the final area of the basins will not be defined until the detailed design stage (post-consent).</p> <p>The Applicant have provided the indicative design assumptions for the basins. The areas of the basins will be specified in an indicative general arrangement drawing to be submitted within an Illustrative Infiltration SuDS Design Clarification Note at Deadline 2. Confirmation of all impermeable areas will be reviewed and included in the final detailed design. The relevant planning authority must approve the final Operational Drainage Management Plan prior to the commencement of construction of onshore works.</p> <p>This matter is under discussion between the Applicants and the Councils.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-05.09	Assessment Conclusions	The conclusions of the assessment of impacts for each project are consistent with the accepted assessment methodologies.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils cannot agree to this statement at this stage, as the assessment methodologies (LA-05.07) have not yet been agreed.  This matter is under discussion between the Applicants and the Councils.
LA-05.10	Assessment Conclusions	The conclusions of the assessment of impacts for the construction and reinstatement of the onshore cable route presented are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils cannot agree to the mitigation as proposed, and in turn cannot agree to the conclusions of the assessment of impacts at this stage until further clarification on the deliverability of the proposed mitigation is provided by the Applicants.  This matter is under discussion between the Applicants and the Councils.
LA-05.11	Assessment Conclusions	The conclusions of the assessment of impacts for the construction, operation and decommissioning of each onshore substation and the National Grid substation presented are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils cannot agree to the mitigation as proposed, and in turn cannot agree to the conclusions of the assessment of impacts at this stage until further clarification on the deliverability of the proposed mitigation is provided by the Applicants.  This matter is under discussion between the Applicants and the Councils.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-05.12	Assessment Conclusions	The assessment of cumulative impacts between East Anglia ONE North and East Anglia TWO is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils query whether the CIA considers the impacts of sedimentation in the Friston Watercourse and potential obstruction of the culvert downstream. Councils to review the embedded and best practice mitigation measures to control the supply of fine sediment from construction activities presented within the ES and confirm their position on this statement.</p> <p>The Councils cannot agree to the mitigation as proposed, and in turn cannot agree to the conclusions of the assessment of impacts at this stage until further clarification on the deliverability of the proposed mitigation is provided by the Applicants.</p> <p>The Applicants note that the mitigation measures proposed draw on Pollution Prevention Guidance and CIRIA guidance which is industry standard across many projects. The Outline Operational Drainage Management Plan will demonstrate that appropriate infiltration design is deliverable within the Order limits and will be incorporated within the operational surface water drainage</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							design, as will an outfall connection to the Friston watercourse.  This matter is under discussion between the Applicants and the Councils.
LA-05.13	Assessment Conclusions	The conclusions of the assessment of cumulative impacts with the proposed Sizewell B Power Station Complex and Sizewell C New Nuclear Power Station are appropriate.	Agreed	Agreed	Agreed	Agreed	Notwithstanding the Councils position set out in LA-05.07-LA-05.12 and the concerns expressed regarding the methodologies, mitigation measures and conclusions of the assessments, the Councils are of the view that the cumulative effects of the Projects with SZB and SZC would not be significant by virtue of the limited overlap of the Order Limits of the Projects.
LA-05.14	Assessment Conclusions	The assessment of cumulative impacts with future projects is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.  The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.
LA-05.15	Mitigation	The embedded mitigation proposed for the construction of the onshore cable route set out within Section 20.3.3 and the monitoring within Section 20.3.4 of the <b>ES</b> (APP-068) and the means for implementation are appropriate and adequate. Any further mitigation requirements will be considered pre-construction within the development of the design and the final CoCP.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils cannot agree to the mitigation as proposed, and in turn cannot agree to the conclusions of the assessment of impacts at this stage until further clarification on the suitability and deliverability of the proposed mitigation is provided by the Applicants. It is noted that a recent similar construction project is known to have encountered problems managing surface water during construction. This resulted in ad-hoc reactive measures being implemented. It is unclear how these Projects propose to prevent the same problems occurring given the similarities between this application and the recent similar construction project (namely insufficient space for SuDS in the cable corridor and reactive installation of proprietary measures for surface water treatment).</p> <p>The Applicants consider that sufficient space is available within the Order limits to accommodate appropriate surface water attenuation measures such as drainage</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							channels along temporary construction haul roads and avoidance of spoil stockpile in strategic areas to allow for the provision of SuDS ponds.  This matter is under discussion between the Applicants and the Councils.
LA-05.16	Mitigation	The embedded mitigation proposed for the construction and operation of each onshore substation and the National Grid substation set out within Section 20.3.3 and monitoring within Section 20.3.4 of the <b>ES</b> (APP-068) and the means for implementation are appropriate and adequate. Any further mitigation requirements will be considered pre-construction within the development of the design and the final CoCP.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils cannot agree to the mitigation as proposed, and in turn cannot agree to the conclusions of the assessment of impacts at this stage until further clarification on the deliverability of the proposed mitigation is provided by the Applicants.  This matter is under discussion between the Applicants and the Councils.
Draft Development Consent Order							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-05.17	Wording of Requirement(s)	The wording of Requirement 22 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a CoCP for the mitigation and monitoring of potential impacts on water resources and flood risk during construction is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	The Councils agreement relates to the wording of Requirement 22 rather than the content of the <b>OCoCP</b> (APP-578).
LA-05.18	Wording of Requirement(s)	The approach to securing a Surface Water and Drainage Management Plan for the operational phase within a standalone Requirement within the DCO is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	<p>The Councils request that the approval of the operational surface water and foul water drainage details be subject to a separate Requirement, rather than incorporated within Requirement 14 (Landscape Management Plan) of the <b>draft DCO</b> (APP-023).</p> <p>The Applicants agree to this request and will provide an updated <b>draft DCO</b> to the Examinations at Deadline 3.</p>
Other Matters as Required							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-05.19	Offsite construction works	Matters in relation to water resources and flood risk at Marlesford Bridge (Work No. 37) are being progressed with the Environment Agency.	Agreed	Agreed	Agreed	Agreed	No further comment on this element will be provided by the Councils as it falls outside the Council's legislative remit.
LA-05.20	Consents and permits	Land Drainage Consent(s) from the Lead Local Flood Authority will be required for both the construction phase (temporary works) and for the operation phase (permanent works) at the onshore substation site.	Agreed	Agreed	Agreed	Agreed	Any potential Land Drainage Consent applications will be discussed with the Lead Local Flood Authority prior to submission.
LA-05.21	Consents and permits	Land Drainage Consent(s) from the Lead Local Flood Authority are likely to be required for the construction phase (temporary works) along the onshore cable route, where it crosses Ordinary Watercourses.	Agreed	Agreed	Agreed	Agreed	Any potential Land Drainage Consent applications will be discussed with the Lead Local Flood Authority prior to submission.
LA-05.22	Consents and permits	Flood Risk Activities Permit(s) from the Environment Agency are likely to be required for the construction phase (temporary	Agreed	Agreed	Agreed	Agreed	No further comment on this element will be provided by the Councils as it falls outside the Council's legislative remit.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		works) along the onshore cable route, where it crosses the Hundred River (Main River).					
LA-05.23	Surface water drainage	An Environmental Permit, covering flood risk activities, from the Environment Agency may be required to connect the surface water drainage into the Main River (Friston Watercourse) as well as agreement from the Lead Local Flood Authority on discharge rates.	Agreed	Agreed	Agreed	Agreed	None



## 2.7 Archaeology and Cultural Heritage

32. The Project has the potential to impact upon archaeology and cultural heritage. **Chapter 24 Archaeology and Cultural Heritage** of the ES (APP-072) and technical appendices **Appendix 24.2** to **Appendix 24.7** (APP-513 to APP-519) provides an assessment of the significance of these impacts.
33. **Table 14** provides an overview of consultation undertaken with the Councils regarding archaeology and cultural heritage. Further details on the stakeholder engagement process for archaeology and cultural heritage can be found in the **Consultation Report** (APP-029).

**Table 14 Summary of consultation with the Councils regarding archaeology and cultural heritage**

Date	Contact Type	Topic
<b>Pre-Application</b>		
26 <sup>th</sup> April 2018	Meeting	Included: Introduction to the projects, Baseline Environment, Approach to Assessment and Potential Impacts.
23 <sup>rd</sup> January 2019	Meeting	Included: Project update and Archaeology and Cultural Heritage update, including ADBA (and settings assessment), Geophysical Survey and key impacts and proposed mitigation.
17 <sup>th</sup> April 2019	Meeting and Site Visit	Included: Project update, Section 42 responses, Coastal assets settings study, Outline Landscape Mitigation Plan, Onshore settings assessment and Site Visit to Rairdsend and Friston / surrounds.
<b>Post-Application</b>		
27 <sup>th</sup> February 2020	Meeting	SoCG meeting 1
23 <sup>rd</sup> June 2020	Meeting	SoCG meeting 2
3 <sup>rd</sup> July 2020	Meeting	SoCG meeting 3
7 <sup>th</sup> October 2020	Meeting	SoCG workshop

34. **Table 15** presents the matters agreed or not agreed between the Applicants and the Councils in relation to onshore archaeology and Cultural Heritage (Unknown Heritage Assets).
35. **Table 16** presents the matters agreed or not agreed between the Applicants and the Councils in relation to the setting of heritage assets.



**Table 15 Onshore Archaeology and Cultural Heritage (Unknown Heritage Assets)**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-06.01	Existing Environment	Sufficient desk based data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-06.02	Existing Environment	Sufficient non-intrusive survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	The Councils' agreement is subject to the matters below in LA- 06.03, LA-06.04, and LA-06.05.
LA-06.03	Existing Environment	Notwithstanding the survey locations for which access was not granted, the trial trenching campaign undertaken by the Applicants (document reference ExA.AS-13.D1.V1), in combination with the geophysical survey results, provide sufficient high-level information to inform the assessment of the significance and character of archaeological remains within the onshore cable corridor.	Agreed	Agreed	Agreed	Agreed	<p>The Applicants will submit a <b><i>Pre-Construction Trial Trenching Report</i></b> (document reference ExA.AS-13.D1.V1), which provides further information on the additional trial trenching undertaken since submission of the Applications, to the Examination at Deadline 1.</p> <p>The Councils agree that where trial trenching has been undertaken, the results support high level characterisation of the nature of the sites at key pinch point locations.</p> <p>The Councils request that further trial trenching post-consent is required in these areas to inform mitigation.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The Applicants have committed to further pre-construction archaeological surveys (trial trenching) with SCC Archaeological Service which are anticipated to commence in 2021 (the scope of which is under discussion).
LA-06.04	Existing Environment	The trial trenching campaign undertaken at the landfall and at Grove Road by the Applicants (document reference ExA.AS-13.D1.V1), in combination with the geophysical survey results, provide sufficient high-level information on the date and character of sites to inform the assessment of the significance and character of archaeological remains at these locations.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants will submit a <b><i>Pre-Construction Trial Trenching Report</i></b> (document reference ExA.AS-13.D1.V1), which provides further information on the additional trial trenching undertaken since submission of the Applications, to the Examination at Deadline 1.</p> <p>The Councils are concerned that the proposed metal-detecting survey and trial trenching was not undertaken at the Grove Road crossing site. The Applicants' citing of access issues is acknowledged by the Councils, but the Councils reiterate that this relative pinch point in the scheme is in the vicinity of suggested sites of Buxlow church / chapel. The location, nature and significance of this site is not confirmed, but the assessment has not fully assessed whether it lies within the red line boundary of the scheme in this area.</p> <p>The Applicants were unable to access this land to undertake surveys but note that geophysical</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							surveys were undertaken at the site of the former parish church of Buxlow/Buxton (KND 009) and this site is considered within the assessment presented in <b>Chapter 24</b> (APP-072). This matter remains under discussion.
LA-06.05	Existing Environment	Sufficient intrusive survey data has been collected to inform the assessment	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils recognise that trial trenching has been undertaken in the area of the onshore substations and at key pinch point locations of the onshore cable corridor (with the exception of one key location see above LA-06.04), as discussed and agreed with the Archaeology and Cultural Heritage Expert Topic Group (ETG), in order to inform the Projects' pre-construction design activities.</p> <p>The Applicants will submit a <b>Pre-Construction Trial Trenching Report</b> (document reference ExA.AS-13.D1.V1), which provides further information on the additional trial trenching undertaken since submission of the Applications, to the Examination at Deadline 1.</p> <p>Requirement 19 and Requirement 20 of the <b>draft DCO</b> (APP-023) will together ensure that the appropriate programme of archaeological investigation and mitigation is undertaken at</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>the appropriate time prior to commencement of construction.</p> <p>The Councils recognise the Applicants' intention to undertake early evaluation but caution that there are risks resulting from over-reliance on geophysical survey as a basis to inform assessment of impact, design and mitigation. Best practice is for geophysical survey to be ground-truthed as part of a suite of evaluation techniques.</p> <p>The Applicants have committed to further pre-construction archaeological surveys (trial trenching) with SCC Archaeological Service which are anticipated to commence in 2021 (the scope of which is under discussion).</p>
LA-06.06	Existing Environment	The ES includes sufficient information to adequately characterise the baseline environment in terms of archaeology and cultural heritage.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not fully agree with the sufficiency of information provided within the ES, understanding that certain pinch point locations (i.e. the Grove Road crossing) has not been subject to trial trenching.</p> <p>The Applicants will submit a <b>Pre-Construction Trial Trenching Report</b> (document reference ExA.AS-13.D1.V1), which provides further information on the additional trial trenching</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>undertaken since submission of the Applications, to the Examination at Deadline 1.</p> <p>The Councils request the parish / Hundred boundary right of way is considered further in the assessment, given its sub-surface potential, cultural contribution as a routeway with landscape significance and connections to built heritage assets.</p> <p>The Applicants have given further consideration to the parish / Hundred boundary within the <b>Archaeology and Cultural Heritage Clarification Note</b> (document reference ExA.AS-10.D1.V1) submitted into the Examination at Deadline 1.</p> <p>Requirement 19 and Requirement 20 of the <b>draft DCO</b> (APP-023) will together ensure that the appropriate programme of archaeological investigation and mitigation is undertaken at the appropriate time prior to commencement of construction.</p> <p>The Councils caution that there are risks resulting from over-reliance on geophysical survey as a basis to inform assessment of impact, design and mitigation. Best practice is</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							for geophysical survey to be ground-truthed as part of a suite of evaluation techniques.  The Applicants have committed to further pre-construction archaeological surveys (trial trenching) which are anticipated to commence in 2021 (the scope of which is under discussion).
LA-06.07	Existing Environment	The baseline environment presented within the ES has been adequately understood.	Agreed	Agreed	Not Agreed-under discussion	Not Agreed – under discussion	Refer to notes at LA-06.06.
LA-06.08	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Agreed	Agreed	None
LA-06.09	Assessment Methodology	The Applications' worst-case (in terms of the design parameters for the Project alone) presented in <b>Section 24.3.2</b> and <b>Table 24.2</b> of the	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		assessment (APP-072) is appropriate.					
LA-06.10	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-06.11	Assessment Conclusions	The conclusions of the assessment of construction impacts for the baseline identified within the assessment are appropriate.	Agreed	Agreed	Agreed	Agreed	The Councils note the Applicants' cautionary approach to assessment which assigns the highest likely level of importance to assets of yet uncertain heritage importance, although reiterate from comment LA-06.05 that a matter of principle is that there is some risk to sites as yet unknown or where significance is not fully established.
LA-06.12	Assessment Conclusions	The conclusions of the assessment of impacts for operation and decommissioning are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-06.13	Assessment Conclusions	The conclusions of the cumulative assessment of	Agreed	Agreed	Agreed	Agreed	The Councils note the Applicants' cautionary approach to assessment which assigns the



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		impacts between East Anglia TWO and East Anglia ONE North are appropriate.					highest likely level of importance to assets of yet uncertain heritage importance, although reiterate from comment LA-06.05 that a matter of principle is that there is some risk to sites as yet unknown or where significance is not fully established.
LA-06.14	Assessment Conclusions	The conclusions of the cumulative assessment of impacts with future projects are appropriate.	Agreed	Agreed	Agreed	Agreed	<p>The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.</p>
LA-06.15	Mitigation	The embedded, initial informative and additional mitigation proposed within <b>Section 24.3.3</b> of the ES (APP-072) are appropriate industry standard approaches	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants have reviewed the Councils comments on the <b>Outline Written Scheme of Investigation</b> (WSI) (APP-582) and agree to incorporate changes.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		to be applied on a case-by-case, area-by-area and/or site-by-site basis.					<p>Councils will review their position on this matter once the <b>Outline WSI</b> (APP-582) document has been updated.</p> <p>The Applicants have committed to further pre-construction archaeological surveys (trial trenching) which are anticipated to commence in 2021 (the scope of which is under discussion). The Applicants believe the commitment to 5% sampling of the onshore development area plus ongoing consultation with the Councils will address the Councils' concerns that insufficient intrusive survey data will be collected.</p>
<b>Draft Development Consent Order</b>							
LA-06.16	Wording of Requirement(s)	The wording of Requirement 19 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a pre-commencement archaeology execution plan to detail the scope of the archaeological	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants will review and update the <b>Outline Pre-Commencement Archaeology Execution Plan</b> (PCAEP) (APP-597) to include a section on how onshore preparation works will be managed in respect of archaeology investigation and consider whether the pre-commencement works may be undertaking in accordance with the final WSI.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		works is appropriate and adequate.					The Applicants and the Councils are currently in discussion regarding the wording of Requirement 19 of the <b>draft DCO</b> (APP-023).
LA-06.17	Wording of Requirement(s)	The wording of Requirement 20 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a written scheme of archaeological investigation detailing the methodology, mitigation and recording of archaeological investigation works is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants and the Councils are currently in discussion regarding the wording of Requirement 20 of the <b>draft DCO</b> (APP-023).
<b>Other Matters as Required</b>							
LA-06.18	Relationship between onshore preparation works and pre-construction archaeological	The final Pre-Commencement Archaeology Execution Plan adequately secures appropriate archaeological measures for the onshore preparation works commitments (activities,	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants confirm that the <b>Outline PCAEP</b> (APP-597) will be updated to include management measures for working hours, noise limits and drainage, and commit that SCC is consulted prior to undertaking any early planting works.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
	investigation documents	responsibilities, timescales and locations).					

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**Table 16 Onshore Archaeology and Cultural Heritage (Setting of Designated and Non-Designated Heritage Assets)**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-07.01	Existing Environment	Sufficient information and data have been collected to characterise the baseline environment in terms of heritage setting.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>In general, the Councils are content with the cultural heritage viewpoints and the survey data submitted, however have commented on the effectiveness of visualisations produced at Woodside Farm and High House Farm. The viewpoint at Woodside Farm is mostly obscured by the property and it would have been preferable to identify a viewpoint behind High House Farm.</p> <p>The visualisations of Woodside Farm and High House Farm include the heritage asset in the wider setting and represent the most appropriate viewpoint. Viewpoint locations were agreed through the Archaeology and Cultural Heritage pre-application ETG process.</p> <p>The Councils do not consider that the significance of the historic parish / Hundred boundary and associated public right of way (PRoW) have been adequately captured. It is also a longstanding cultural boundary and routeway with landscape significance and connections to built heritage assets.</p> <p>The Applications identify the Parish boundary (PB1) as a trackway within <b>Chapter 24 Archaeology and</b></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p><b>Cultural Heritage</b> (APP-072). PB1 is considered to be a heritage asset, and any hedgerow along the boundary is identified as an 'Important Hedgerow'. PB1 as an Important Hedgerow is assessed in <b>section 24.6.1.2.1.3</b> as part of the construction impacts associated with direct impact on above ground archaeological remains and heritage assets (including Historic Landscape Character), as well as within <b>section 4.2</b> (paragraph 308) of <b>Appendix 24.3</b> (APP-514).</p> <p>Impacts upon the PRoW associated with PB1 and impacts to the users of this PRoW along the Parish boundary have been assessed in <b>Appendix 24.7</b> of the ES (APP-519).</p> <p>The Applicants has submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> (document reference ExA.AS-10.D1.V1) at Deadline 1, which includes the PRoW and parish boundary within the baseline and considers its influence as an element of the historic landscape character.</p>
LA-07.02	Existing Environment	The baseline environment presented within the ES has been adequately understood.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils do not consider that the significance of the historic parish / Hundred boundary and associated PRoW have been adequately captured. It is also a longstanding cultural boundary and



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>routeway with landscape significance and connections to built heritage assets.</p> <p>The Applications identify the Parish boundary (PB1) as a trackway within <b>Chapter 24 Archaeology and Cultural Heritage</b> (APP-072). PB1 is considered to be a heritage asset, and any hedgerow along the boundary is identified as an 'Important Hedgerow'. PB1 as an Important Hedgerow is assessed in <b>section 24.6.1.2.1.3</b> as part of the construction impacts associated with direct impact on above ground archaeological remains and heritage assets (including Historic Landscape Character), as well as within <b>section 4.2</b> (paragraph 308) of <b>Appendix 24.3</b> (APP-514).</p> <p>Impacts upon the PRoW associated with PB1 and impacts to the users of this PRoW along the Parish boundary have been assessed in <b>Appendix 24.7</b> of the ES (APP-519).</p> <p>The Applicants has submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> (document reference ExA.AS-10.D1.V1) at Deadline 1, which includes the PRoW and parish boundary within the baseline and considers its influence as an element of the historic landscape character.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-07.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	The Councils are content that Historic England's methodology for assessing cultural heritage setting has been adopted.
LA-07.04	Assessment Methodology	The assessment of impacts presented within the ES sufficiently covers the potential impacts scoped into the assessment.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils raised concerns regarding the lack of impact assessment on the experience of cultural heritage setting of the PRoW along the parish / Hundred boundary between Friston and Knodishall.</p> <p>The Applicants have assessed impacts upon the PRoW associated with the parish boundary and impacts to the users of this PRoW in <b>Appendix 24.7</b> of the ES (APP-519).</p> <p>The Applicants has submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> (document reference ExA.AS-10.D1.V1) at Deadline 1, which includes the PRoW and parish boundary within the baseline and considers its influence as an element of the historic landscape character.</p>
LA-07.05	Assessment Methodology	The approach to scoping out construction phase	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		impacts upon the setting of heritage assets from further, more detailed assessment is appropriate.					
LA-07.06	Assessment Methodology	The Applications' worst-case scenarios (in terms of the design parameters for the project alone) as presented in <b>Section 24.3.2</b> ; and <b>Table 24.2</b> Realistic Worst Case Scenarios (APP-072), and <b>Section 3</b> of the Onshore Settings Assessment (APP-519) are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-07.07	Assessment Conclusions	The assessment of impacts for the construction, operation and decommissioning phase presented are	Agreed	Agreed	Agreed	Agreed	The Councils agree that the assessment of impacts is consistent with the methodologies.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		consistent with the agreed assessment methodologies.					
LA-07.08	Assessment Conclusions	The conclusions of the assessment of impacts for the operation phase are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils disagree with the impact assessment outcomes, reflecting a difference in judgement.</p> <p>The Councils disagree with some of the conclusions of the assessment. The Councils consider that the level of harm to Woodside Farm, High House Farm and the Church of St Mary would be higher than suggested in the assessment and that the proposed mitigation would not reduce the level of harm.</p> <p>In order to produce an accurate assessment of the contribution of historical setting to significance, an independent expert (Headland Archaeology) was commissioned by the Applicants. The subsequent conclusions and narrative provided in <b>section 24.6.2.1</b> are based on and supported by this independent study (<b>Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes</b> (APP-519)).</p> <p>The Applicants have provided an <b>Archaeology and Cultural Heritage Clarification Note</b> (document reference ExA.AS-10.D1.V1) which includes the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							PRoW and parish boundary within the baseline and considers its influence as an element of the historic landscape character.
LA-07.09	Assessment Conclusions	The conclusions of the assessment of cumulative impacts between East Anglia TWO and East Anglia ONE North for the operational phase are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils disagree with the CIA outcomes, reflecting a difference in judgement.</p> <p>The Councils disagree with some of the project alone conclusions which feed into the cumulative assessment. The Councils consider that the level of harm to Woodside Farm, High House Farm and the Church of St Mary would be higher than suggested in the assessment and that the proposed mitigation would not reduce the level of harm.</p> <p>In order to produce an accurate assessment of the contribution of historical setting to significance, an independent contractor (Headland Archaeology) was commissioned by the Applicants. The subsequent conclusions and narrative provided in <b>section 24.6.2.1</b> are based on and supported by this independent study (<b>Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes</b> (APP-519)). The Applicants are therefore of the view that an understanding of the historic landscape character</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							has been adequately captured and potential impacts have been robustly assessed.
LA-07.10	Assessment Conclusions	The conclusions of the cumulative assessment of impacts with future projects are appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.</p>
LA-07.11	Mitigation	The embedded and additional mitigation measures proposed within <b>Section 24.3.3</b> of the ES (APP-072) are designed to not cause further harm to the setting of heritage assets.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-07.12	Mitigation	The embedded and additional mitigation measures proposed within <b>Section 24.3.3</b> of the ES (APP-072) minimise adverse impacts to the setting of heritage assets.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils believe that the assessed impacts to heritage setting cannot be mitigated as a result of the proposed land take.</p> <p>The Councils welcome that mitigation planting is set back from cultural heritage assets but remain of the position that any landscaping measures will not lessen or mitigate the impact upon heritage setting from the presence of substations within this landscape.</p> <p>The Applicants believe the proposed mitigation is as robust and considered as possible. An Outline Landscape Mitigation Plan has been submitted as part of the <b>OLEMS</b> (APP-584) which seeks, among other objectives, to reduce adverse impacts on the heritage assets at Friston. The <b>OLEMS</b> has been developed to take into consideration historic landscape and re-establishing historic field boundaries where possible. In areas to the immediate north of Friston, the re-establishment of historic field boundaries, filling gaps in existing hedgerows and introducing field boundary trees has been proposed to provide layered screening, rather than large-scale woodland planting close to the village. This allows the ‘setting’ of Friston to be retained (rather than being contained by woodland).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
Draft Development Consent Order							
N/A							
Other Matters as Required							
N/A							

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## 2.8 Noise and Vibration

36. The projects have the potential to impact upon noise and vibration. **Chapter 25 Noise and Vibration** of the ES (APP-073) provides an assessment of the significance of these impacts.
37. **Table 17** provides an overview of consultation undertaken with the Councils regarding noise and vibration. Further details on the stakeholder engagement process for noise and vibration can be found in the **Consultation Report** (APP-029).

**Table 17 Summary of consultation with the Councils regarding noise and vibration**

Date	Contact Type	Topic
<b>Pre-Application</b>		
26 <sup>th</sup> April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
29 <sup>th</sup> January 2019	Meeting	Initial results from the impact assessment, project updates
7 <sup>th</sup> May 2019	Meeting	Impact assessment methodology and approach
<b>Post-Application</b>		
7 <sup>th</sup> February 2020	Meeting	SoCG meeting 1
7 <sup>th</sup> October 2020	Meeting	SoCG workshop

38. **Table 18** presents the matters agreed or not agreed between the Applicants and the Councils in relation to operation phase noise and vibration.
39. **Table 19** presents the matters agreed or not agreed between the Applicants and the Councils in relation to construction phase noise and vibration.



Table 18 Operation Phase Noise and Vibration

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-08.01	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-08.02	Existing Environment	The ES adequately characterises the baseline environment in terms of noise.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree that 29 dBA used in the assessment is representative of the typical background noise levels in the area.</p> <p>The Applicants have provided the Councils with the baseline monitoring survey data, as well as a draft Noise and Vibration Clarification Note.</p> <p>The Applicants will update the Noise and Vibration Clarification Note and will include further information on the context of the baseline noise monitoring data analysis and will submit the Noise and Vibration Clarification Note to the Examinations at Deadline 2.</p>
LA-08.03	Assessment Methodology	The study area adopted for the EIA provides appropriate geographical coverage to assess potential impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-08.04	Assessment Methodology	A noise limit of +5dB on background noise levels is acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree with the Applicants that +5dB over background noise is an acceptable limit for operational noise. The Councils seek an operational noise limit of -5dB below background noise levels.</p> <p>The EIA concludes potential impacts of negligible significance based on a +5 dBA increase on background noise levels. The Applicants note the need to ensure an efficient and economical design of the onshore substation is achieved whilst adhering with the noise limits set out in Requirement 26 and Requirement 27 of the <b>draft DCO</b> (APP-023).</p> <p>The Councils request the Applicants strive for the lowest possible noise emissions from the onshore substations and demonstrate this within the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) with a commitment to seeking to reduce the noise output of the substation post consent.</p> <p>The Applicants note that whilst there are aspects of the design which will be subject to further consultation and approval, the DCO authorises the Projects within specified parameters and it is not appropriate for all such parameters to be subject to uncertainty</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							associated with the requirement for further approvals.
LA-08.05	Assessment Methodology	The baseline noise monitoring methodology used for the EIA provides an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils agree that the use of 5-minute noise survey data is unlikely to have a significant effect on the background noise levels determined over the equivalent individual 15-minute assessment periods, but maintain that the analysis used to determine a typical overall background noise level of 29 dBA for the assessment does not produce a representative figure for typical background noise levels in accordance with the standard.</p> <p>The Applicants do not agree with the Councils position that 29dBA is not a representative background noise level.</p> <p>The Applicants consider that the background noise levels of 29dB(A) has been derived in accordance with the relevant British Standard (BS4142:2014 +A1:2019).</p> <p>The Applicants have provided the Councils with the baseline monitoring survey data, as well as a draft Noise and Vibration Clarification Note. The Applicants will submit a Noise and Vibration Clarification Note to the Examinations at Deadline 2.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-08.06	Assessment Methodology	The operational noise modelling methodology used for the EIA provides an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants will submit a Noise Modelling Clarification Note to the Examinations at Deadline 3 which will include information on the size and arrangement of modelled noise sources, mitigation measures incorporated into the noise model and the relative levels of the different noise sources at each receptor (in Octave Bands where the data is available).</p> <p>The Councils have requested this additional information and once submitted will review and provide an update to their position.</p>
LA-08.07	Assessment Methodology	BS4142 is the appropriate method of assessing noise levels and potential impacts.	Agreed	Agreed	Agreed	Agreed	None
LA-08.08	Assessment Methodology	The worst case scenario(s) presented for one project alone in <b>Table 25.2, Chapter 25</b> of the ES (APP-073) is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils maintain that the impact of noise from the new National Grid infrastructure associated with the development, including new transmission lines, should be included within the assessment as insufficient information has been provided to justify its exclusion.</p> <p>The Applicants will provide further information on National Grid operational noise levels within a Noise Modelling Clarification Note which will be submitted at Deadline 3.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-08.09	Assessment Methodology	The assessment of non-residential receptors and amenity space is sufficient.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants will undertake an assessment of noise impacts on non-residential receptors and include this within a Noise Modelling Clarification Note which will be submitted at Deadline 3.</p> <p>The Councils have requested this additional work be undertaken and will review the clarification note once submitted and update their position.</p>
LA-08.10	Assessment Methodology	The timing of the baseline noise monitoring surveys is representative of the annual existing noise environment.	Agreed	Agreed	Agreed	Agreed	None
LA-08.11	Assessment Conclusions	The conclusions of the assessment of impacts for the operation phase presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants have provided further detail on acoustic corrections within the draft Noise and Vibration Clarification Note issued to the Councils.</p> <p>This Noise and Vibration Clarification Note will be submitted to the Examinations at Deadline 2.</p> <p>Discussion between the Applicants and the Councils regarding this matter are ongoing.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-08.12	Assessment Conclusions	The conclusions of the assessment of impacts for the operation phase presented are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants and the Councils acknowledge that this statement may not be agreed until agreement on all statements in relation to the Assessment Methodology is reached.</p> <p>The Applicants have issued a draft Noise and Vibration Clarification Note to the Councils and will submit the Noise and Vibration Clarification Note to the Examinations at Deadline 2.</p>
LA-08.13	Assessment Conclusions	The conclusions of the assessment of cumulative impacts between East Anglia ONE North and East Anglia TWO (including National Grid infrastructure) are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants and the Councils acknowledge that this statement may not be agreed until agreement on all statements in relation to the Assessment Methodology is reached.</p> <p>The Applicants have issued a draft Noise and Vibration Clarification Note to the Councils and will submit the Noise and Vibration Clarification Note to the Examinations at Deadline 2.</p>
LA-08.14	Assessment Conclusions	The assessment of cumulative impacts with Sizewell C is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-08.15	Assessment Conclusions	The assessment of cumulative impacts with future projects is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Council's and Applicants' position on the CIA.</p>
LA-08.16	Mitigation	The approach to mitigating operation phase noise at the detailed design stage is appropriate and proportionate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not consider the mitigation measures included within the noise modelling, or those which could be adopted to ensure compliance with operational noise limits in the <b>draft DCO</b> (APP-023), have been adequately described by the Applicants.</p> <p>The EIA concludes potential impacts of negligible significance based on a +5 dBA increase on background noise levels. The Applicants note the need to ensure an efficient and economical design of the onshore substation is achieved whilst adhering with the noise limits set out in Requirement 26 and Requirement 27 of the <b>draft DCO</b> (APP-023).</p> <p>The Applicants consider that it is misleading to list theoretical mitigation measures when the design of the onshore substations will adopt all necessary mitigation measures in order to ensure compliance with the noise limits specified within the <b>draft DCO</b> (APP-023).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Draft Development Consent Order (DCO)</b>							
LA-08.17	Wording of DCO Requirement(s)	Requirement 26 of the <b>draft DCO</b> (APP-023) (and supporting certified documents) for the mitigation of operational impacts with respect to noise and vibration of one project alone are considered appropriate and proportionate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree with the Applicants' position that:</p> <ul style="list-style-type: none"> <li>34dB is an appropriate operational noise limit;</li> <li>Low frequency noise is sufficiently controlled; and</li> <li>Adequate operation phase monitoring locations are secured within the wording of Requirement 26 of the <b>draft DCO</b> (APP-023).</li> </ul> <p>The Applicants are considering adding an additional operation phase noise monitoring location (to the north of the National Grid substation) within the wording of Requirement 26.</p> <p>Discussions between the Applicants and Councils to resolve these matters are ongoing.</p>
LA-08.18	Wording of DCO Requirement(s)	Requirement 27 of the <b>draft DCO</b> (APP-023) (and supporting certified documents) for the mitigation of cumulative operational impacts with respect to noise	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree with the Applicants' position that:</p> <ul style="list-style-type: none"> <li>34dB is an appropriate operational noise limit;</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		and vibration are considered appropriate and proportionate.					<ul style="list-style-type: none"> <li>Low frequency noise is sufficiently controlled; and</li> <li>Adequate operation phase monitoring locations are secured within the wording of Requirement 26 of the <b>draft DCO</b> (APP-023).</li> </ul> <p>The Councils consider that the noise from the associated National Grid infrastructure should be included within the cumulative noise limits.</p> <p>The Applicants consider that the National Grid substation contribution to received noise levels at the nearest noise sensitive receptors is sufficiently low so as not to warrant inclusion within Requirement 27. Further information on this matter will be submitted to the Examinations at Deadline 3.</p> <p>Discussions between the Applicants and Councils to resolve these matters are ongoing.</p>
LA-08.19	Wording of DCO Requirement(s)	Requirement 12 of the <b>draft DCO</b> (APP-023) (and supporting certified documents) relating to the detailed design parameters onshore, are considered appropriate and proportionate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils request the Applicants strive for the lowest possible noise emissions from the onshore substations and demonstrate this within the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) with a commitment to seeking to reduce the noise output of the substation post consent.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Applicants note that whilst there are aspects of the design which will be subject to further consultation and approval, the DCO authorises the Projects within specified parameters and it is not appropriate for all such parameters to be subject to uncertainty associated with the requirement for further approvals.</p> <p>The Councils also consider that the National Grid substation (Work No. 41) should be incorporated into Requirement 12 on a similar basis to the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585).</p> <p>The Applicants will prepare an <b>Outline National Grid Substation Design Principles Statement</b> and submit this into the Examination at Deadline 1 (document reference ExA.AS-6.D1.V1). Requirement 12 will be updated to reflect this and the updated <b>draft DCO</b> (APP-023) will be submitted to the Examinations at Deadline 3.</p>
<b>Other Matters as Required</b>							
LA-08.20	Consideration of Alternatives	The choice of technology for the National Grid substation (Air Insulated or Gas	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Discussions between the Applicants and Councils to resolve these matters are ongoing.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Insulated) is not material to noise matters.					
LA-08.21	Long Term Management of the Site	The Councils request that a Community Liaison Group be established in relation to the Grove Wood, Friston substation site.	Not Agreed – under discussion	Not Agreed – under discussion	Agreed	Agreed	<p>The Applicants do not agree with the Councils position that a community liaison group between the operators, local community and the Councils is necessary.</p> <p>However, the Applicants are committed to ensuring means of communication between the Project and the Councils and community representatives as is usually provided for such projects.</p>

**Table 19 Construction Phase Noise and Vibration**

ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-09.01	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-09.02	Assessment Methodology	The study area adopted for the EIA provides appropriate geographical coverage to assess potential impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-09.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential construction noise impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	<p>Whilst the Councils believe that the ABC methodology from BS 5228 could underestimate impacts in quieter rural areas, the Councils in principle agree to adopt this methodology on the basis that adequate assurances will also be provided in relation to the SoundPLAN noise prediction methodology and night-time construction noise impacts.</p> <p>The Applicants have provided a draft Noise and Vibration Clarification Note to the Councils for comment, which provides further information on data sources for transient construction plant/activity and clarification on night time construction noise. The Noise and Vibration Clarification Note will be submitted to the Examinations at Deadline 2 and a Noise</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Modelling Clarification Note will be submitted to the Examinations at Deadline 3.
LA-09.04	Assessment Methodology	It is appropriate that the impact assessment did not include the application of acoustic screening when assessing potential construction noise impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-09.05	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential construction phase vibration impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-09.06	Assessment Methodology	The worst case scenario(s) presented for one project alone set out in Table 25.2 in the assessment is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants have provided a draft Noise and Vibration Clarification Note to the Councils for comment, which provides clarification on the sub-phases/time blocks used to inform the assessment. The Noise and Vibration Clarification Note will be submitted to the Examination at Deadline 2.
LA-09.07	Assessment Conclusions	The assessment of construction and	Agreed	Agreed	Agreed	Agreed	The Councils agree that the construction and decommissioning phase noise impacts



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		decommissioning phase noise impacts presented are consistent with the agreed assessment methodologies.					presented are consistent with the overarching assessment methodology, subject to clarifications on the SoundPLAN modelling as per LA-09.03.  The Applicants respond on this matter at LA-09.03.
LA-09.08	Assessment Conclusions	The assessment of construction and decommissioning phase vibration impacts presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-09.09	Assessment Conclusions	The assessment of construction and decommissioning phase noise impacts presented are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Whilst there is now broad agreement on many aspects of the construction and decommissioning noise assessment, the Councils cannot ultimately be satisfied that the assessment and its conclusions are appropriate until there is sufficient reassurance that the noise predictions and assessment are representative and appropriately robust.  The Applicants have requested clarification on the specific outstanding matters that the Councils refer to in the above comment and continue to liaise with the Councils on this matter.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-09.10	Assessment Conclusions	The assessment of construction and decommissioning phase vibration impacts presented are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-09.11	Assessment Conclusions	The assessment of cumulative construction phase vibration impacts of the Projects is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-09.12	Assessment Conclusions	The assessment of cumulative construction phase noise impacts of the Projects is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-09.13	Assessment Conclusions	The assessment of cumulative construction phase vibration impacts with Sizewell C New Nuclear Power Station is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants are preparing a Sizewell C CIA Clarification Note, which will consider cumulative vibration impacts with Sizewell C and be submitted to the Examinations at Deadline 2.
LA-09.14	Assessment Conclusions	The assessment of cumulative construction phase noise impacts with Sizewell C New Nuclear Power Station is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants are preparing a Sizewell C CIA Clarification Note, which will consider cumulative vibration impacts with Sizewell C and be submitted to the Examinations at Deadline 2.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-09.15	Assessment Conclusions	The assessment of cumulative construction phase vibration and noise impacts with other future projects is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Council's and Applicant's position on the CIA.</p>
LA-09.16	Mitigation	The proposed mitigation of construction phase noise is appropriate and proportionate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils acknowledged that it is unreasonable to finalise construction mitigation proposals at this stage but disagree that applying an arbitrary 5-10 dB(A) reduction to account for standard construction noise mitigation represents a conservative approach.</p> <p>The Councils have therefore requested that the final CoCP secures mitigation over and above best practicable means, to ensure that the assumed 5-10 dB(A) reductions are more likely to occur at specific noise-sensitive receptors.</p> <p>Appendix 25.4 (APP-525) states that Best Practice (excluding any form of screening) could reduce the levels by 5-10dBA. The</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>Applicants have incorporated a conservative 5dB(A) reduction to apply to the predicted noise levels.</p> <p>The Applicants agree to identify areas of increased sensitivity to residential properties within an updated <b>OCoCP</b> (APP-578) and consider reasonable additional mitigation measures at these locations when producing the final CoCP.</p>
<b>Draft Development Consent Order</b>							
LA-09.17	Wording of DCO Requirement(s)	Requirement 22(2)(c) of the <b>draft DCO</b> (APP-023) (and supporting certified documents) for the mitigation of construction impacts with respect to noise and vibration are considered appropriate and proportionate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils believe that the scope and extent of onshore preparation works as defined in the <b>draft DCO</b> (APP-023) include some activities and processes which carry the potential to result in significant noise and vibration effects, depending on the location and specific nature of works. The Councils therefore believe that preparation works should only be undertaken during the same construction hours as proposed for the main construction(s) and that noise and vibration generated by these works should not result in any significant effects on noise-sensitive receptors, in accordance with the noise and vibration methodology and criteria adopted for the DCO (the ABC Method from BS 5228-1:2009).</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Applicants consider that sufficient controls exist on relevant onshore preparation works (such as creation of accesses and archaeological works) and the nature of the remaining onshore preparation works are such that no additional controls are necessary.</p> <p>Discussions between the Applicants and Councils to resolve these matters are ongoing.</p>
LA-09.18	Wording of DCO Requirement(s)	Requirement 23 of the <b>draft DCO</b> (APP-023) relating to construction hours for transmission works is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils believe that the scope and extent of “essential activities” which may be undertaken outside normal construction hours include some activities and processes which carry the potential to result in significant noise (and vibration) effects, depending on the location and specific nature of works. The Councils therefore request that there is a commitment (ideally within the <b>OCoCP</b> (APP-578)) confirming that the potential noise (and/or vibration) impact of night-time working will be considered prior to any such works, and that night-time works will be designed and undertaken to ensure that noise from such works does not exceed the BS 5228 criteria for night-time construction, determined in accordance with the ABC method and therefore in accordance with the overarching assessment methodology.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							As per the worst-case scenario defined within <b>Table 25.2, Chapter 25</b> of the ES (APP-073), exceptions to the normal working hours are not included within the noise impact assessment and have therefore not been assessed given that they would be exceptional activities which will be infrequent and of short duration. It is also noted that such works will require the approval of the relevant planning authority (apart from during where works cannot be safely stopped or in emergencies) and this approval process provides adequate controls.
LA-09.19	Wording of DCO Requirement(s)	Requirement 24 of the <b>draft DCO</b> (APP-023) relating to construction hours for grid connection works is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils believe that the scope and extent of “essential activities” which may be undertaken outside normal construction hours include some activities and process which carry the potential to result in significant noise (and vibration) effects, depending on the location and specific nature of works. The Councils therefore request that there is a commitment (ideally within the final <b>OCoCP</b> (APP-578)) confirming that the potential noise (and/or vibration) impact of night-time working will be considered prior to any such works, and that night-time works will be designed and undertaken to ensure that noise from such works does not exceed the BS 5228 criteria for night-time construction, determined in accordance with the ABC method and



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							therefore in accordance with the overarching assessment methodology.  As per the worst case scenario defined within <b>Table 25.2, Chapter 25</b> of the ES (APP-073), exceptions to the normal working hours are not included and have therefore not been assessed given that exceptional activities will be infrequent, subject to the approval of the relevant planning authority, of short duration or in case of emergencies.
LA-09.20	<b>Outline Code of Construction Practice</b> (APP-578)	Measures presented within the <b>OCoCP</b> (APP-584) secure appropriate and sufficient engagement with landowners and other affected peoples.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils acknowledged that it is unreasonable to finalise construction noise / vibration mitigation at this stage but in lieu of detailed construction proposals the final CoCP should make clear that construction works will be planned and mitigation adopted as required to ensure that significant effects are avoided as far as possible and practicable, in accordance with the agreed assessment methodology specifically, the BS 5228 ABC Method.  The Applicants note that construction works will be undertaken in line with EIA but agree to identify areas of increased sensitivity to residential properties within an updated <b>OCoCP</b> (APP-578) and consider reasonable additional mitigation measures at these locations when producing the final CoCP.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
Other Matters as Required							
N/A							

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## 2.9 Traffic and Transport

40. The projects have the potential to impact upon traffic and transport. **Chapter 26 Traffic and Transport** of the ES (APP-074) provides an assessment of the significance of these impacts.
41. **Table 20** provides an overview of consultation undertaken with the Councils regarding traffic and transport. Further details on the stakeholder engagement process for traffic and transport can be found in the **Consultation Report** (APP-029).

**Table 20 Summary of consultation with the Councils regarding traffic and transport**

Date	Contact Type	Topic
<b>Pre-Application</b>		
26 <sup>th</sup> April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, study area, impacts, data collection, etc.)
8 <sup>th</sup> May 2018	Meeting	Baseline and study area refinement
18 <sup>th</sup> July 2018	Meeting	Approach to road safety audit, driver delay baseline and assessment methodology
18 <sup>th</sup> September 2018	Meeting	Discussion on traffic distribution methodology, highways improvements, traffic demand and delivery routes
21 <sup>st</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
13 <sup>th</sup> May 2019	Meeting	Traffic forecasts, worst case assessment parameters and travel plans arrangements
<b>Post-Application</b>		
24 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
25 <sup>th</sup> June 2020	Meeting	SoCG Meeting 2
20 <sup>th</sup> July 2020	Meeting	SoCG Meeting 3
29 <sup>th</sup> September 2020	Meeting	SoCG Meeting 4



42. **Table 21** presents the matters agreed or not agreed between the Applicants and the Councils in relation to traffic and transport. The statements within **Table 21** relate only insofar as to the assessment of traffic and transport within the Applications, and do not extend to the assessments of other topics which may influence the traffic and transport assessments.
43. For the purposes of reading this SoCG, the terms used within **Table 21** are defined as follows:
- Driver Delay: Capacity – sensitive junctions have been identified that require an assessment of potential delays for drivers during peak hours. GEART<sup>‡</sup> recommends the use of proprietary software packages to model junction delay and therefore estimate increased vehicle delays. However, it is noted that vehicle delays are only likely to be significant when the surrounding highway network is at, or close to, capacity.
  - Driver Delay: Highway Geometry – delays associated with HGVs attempting to pass at locations where the existing highway width is constrained. To test if these delays are likely to be significant ‘swept path analysis’ vehicle simulation has been used at these locations to understand if highway geometry and vehicle manoeuvrability would lead to delays.

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<sup>‡</sup> The Guidelines for the Environmental Assessment of Road Traffic, IEMA (formally IEA) 1993.



Table 21 Traffic and Transport

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-10.01	Existing Environment	Sufficient survey data has been collected to inform the traffic and transport assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-10.02	Existing Environment	The ES adequately characterises the baseline environment in terms of traffic and transport.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils require further assurance that changes to driver delay over time are considered and have requested evidence that a future year baseline beyond 2023 will not change the assessed driver delay impacts (see LA-10.08).</p> <p>The Applicants have prepared a <b>Traffic and Transport: Deadline 1 Clarification Note</b> (document reference ExA.AS-8.D1.V1) to address this matter which has been submitted to the Examination at Deadline 1.</p>
LA-10.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an acceptable approach to assessing	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils have raised a number of queries relating to the assessment presented within <b>Chapter 26 Traffic and Transport</b> of the ES (APP-074).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		potential impacts of the Projects.					<p>The Applicants have prepared a <b><i>Traffic and Transport: Deadline 1 Clarification Note</i></b> (document reference ExA.AS-8.D1.V1), which has been submitted to the Examination at Deadline 1. Further clarification on matters not considered within the clarification note submitted at Deadline 1 will be submitted at Deadline 3.</p> <p>The Councils queried whether onshore preparation works are controlled by Requirement 16 of the <b><i>draft DCO</i></b> (APP-023).</p> <p>It is noted that the construction of any access (including those undertaken as part of the onshore preparation works) must comply with a final Access Management Plan prepared under Requirement 16 (see LA-10.26).</p> <p>It is noted that The Applicants clarify that Work Nos. 35, 36 and 37 are not onshore preparation works and must comply with the final CTMP, CoCP and Travel Plan.</p> <p>These matters remain under discussion between the Applicants and the Councils.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.04	Assessment Methodology	The GEART assessment methodology used for the EIA is an appropriate and acceptable approach to assessing potential impacts of the Projects.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils expressed an opinion that the GEART methodology is too coarse a tool to assess impacts at the local level (with particular reference to the impact thresholds).</p> <p>The Applicants have prepared a <b>Traffic and Transport: Deadline 1 Clarification Note</b> (document reference ExA.AS-8.D1.V1) to further detail their use of the GEART assessment methodology which has been submitted to the Examination at Deadline 1.</p>
LA-10.05	Assessment Methodology	Given that the construction and operational port(s) are yet to be identified, it is appropriate for mitigation measures at the selected port(s) to be addressed by Requirement 36 of the <b>draft DCO</b> (APP-023)	Agreed	Agreed	Agreed	Agreed	<p>The Councils have advised that they accept the approach adopted, however, they have in-principle concerns with the lack of national policy to address the cumulative onshore impacts of port developments related to offshore windfarm projects.</p> <p>The Applicants note that Requirement 36 of the <b>draft DCO</b> (APP-023) requires a Port Travel Plan, applicable to both the construction and operation of the Projects, to be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority. See LA-10.28.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.06	Assessment Methodology	The realistic worst case scenario for one project, in terms of peak HGV movements presented within <b>Chapter 26 Traffic and Transport</b> (APP-074), is acceptable assuming a construction commencement year of 2023.	Agreed	Agreed	Agreed	Agreed	The Councils agree that the worst case scenario for the year 2023 is presented.  The Applicants confirm that the <b>OCTMP</b> (APP-586) and <b>OTP</b> (APP-588) will include measures to control traffic flows to the levels assessed within <b>Chapter 26 Traffic and Transport</b> (APP-074) and will include measures to monitor and report on such traffic flows.
LA-10.07	Assessment Methodology	The realistic cumulative worst case scenario, in terms of peak HGV movements for both East Anglia ONE North and East Anglia TWO together, presented within <b>Appendix 26.2</b> of the ES (APP-074) is acceptable assuming a construction commencement year of 2023.	Agreed	Agreed	Agreed	Agreed	The Councils agree that the worst case scenario for the year 2023 is presented.  The Applicants confirm that the <b>OCTMP</b> (APP-586) and <b>OTP</b> (APP-588) will include measures to control traffic flows to the levels assessed within <b>Chapter 26 Traffic and Transport</b> (APP-074) and include measures to monitor and report on such traffic flows.
LA-10.08	Assessment Methodology	The assessment of transport and traffic impacts based on an assumed commencement of construction year of 2023 is an acceptable assumption.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils have requested evidence that a delayed construction start will not materially change the driver delay assessment outcomes.  The Applicants have prepared a <b>Traffic and Transport: Deadline 1 Clarification Note</b>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							(document reference ExA.AS-8.D1.V1) to address this matter which has been submitted to the Examination at Deadline 1.
LA-10.09	Assessment Methodology	The approach to assessing cumulative impacts between East Anglia ONE North and East Anglia TWO is acceptable.	Agreed	Agreed	Agreed	Agreed	None
LA-10.10	Assessment Methodology	The approach to assessing cumulative impacts with Sizewell C is acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>SCC note that the SZC assessment submitted with the SZC DCO application will be subject to review and submission of supplemental information.</p> <p>The Applicants are preparing a clarification note to provide a further assessment of cumulative traffic and transport impacts following the submission of the Sizewell C DCO application and will submit this to the Examination at Deadline 2.</p>
LA-10.11	Assessment Methodology	The assumed vehicle occupancy rate presented within the <b>OTP</b> (APP-588) is acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils agree with this statement subject to the <b>OTP</b> (APP-588) being updated with monitoring and control measures of the vehicle occupancy rate. The Applicants confirm the



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<b>OTP</b> (APP-588) will be updated - see LA-10.06 and LA-10.07.
LA-10.12	Assessment Conclusions	The conclusions presented within <b>Chapter 26 Traffic and Transport</b> (APP-074) and its associated appendices are consistent with the applied methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-10.13	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon pedestrian amenity presented are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils agree to this statement apart from the conclusions derived from the use of the GEART methodology. The Applicants have prepared a <b>Traffic and Transport: Deadline 1 Clarification Note</b> (document reference ExA.AS-8.D1.V1) to further detail the use of the GEART assessment methodology and has been submitted to the Examination at Deadline 1.  The Councils are to review the note and confirm their position.
LA-10.14	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon link	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils agree to this statement apart from the conclusions derived from the use of the GEART methodology. The Applicants have prepared a <b>Traffic and Transport: Deadline 1</b>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		severance presented are acceptable.					<b>Clarification Note</b> (document reference ExA.AS-8.D1.V1) to further clarify the use of the GEART assessment methodology which has been submitted to the Examination at Deadline 1.  Councils to review and confirm their position on this statement.
LA-10.15	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon road safety presented are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Councils to review and confirm their position on this statement, noting the Councils' concerns relating to the Friday Street (A12/ A1094) junction. See item LA-10.25.  The Applicants have prepared a <b>Traffic and Transport: Deadline 1 Clarification Note</b> (document reference ExA.AS-8.D1.V1) to further detail the use of the GEART assessment methodology which has been submitted to the Examination at Deadline 1.
LA-10.16	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon driver delay in terms of capacity presented are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Councils to review and confirm their position on this statement.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.17	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon driver delay in terms of highway geometry presented are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Councils to review and confirm their position on this statement.
LA-10.18	Assessment Conclusions	The conclusions of the assessment of impacts for operation presented are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils have queried whether the AIL route between Lover's Lane and Friston will be secured during the operational phase of the Projects.  The Applicants respond to the matter of operational AIL routes at LA-10.36.
LA-10.19	Assessment Conclusions	The conclusions of the assessment of impacts for decommissioning presented are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils require clarification on the access strategy for decommissioning and potential HGV / AIL routes.  The Applicants respond to the matter of decommissioning AIL routes at LA-10.36.  HGV routing during decommissioning has been assessed as per the HGV routing for construction. Requirement 30 (Onshore Decommissioning) of the <b>draft DCO</b> (APP-023) requires an onshore decommissioning plan to be submitted to and approved by the relevant



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							planning authority. This onshore decommissioning plan will confirm transport routes and controls which will be adopted during decommissioning.
LA-10.20	Assessment Conclusions	The assessment conclusions of cumulative impacts between East Anglia ONE North and East Anglia TWO are acceptable.	Agreed	Agreed	Agreed	Agreed	None
LA-10.21	Assessment Conclusions	The assessment conclusions of cumulative impacts with the proposed Sizewell C project are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants are preparing a clarification note to provide a further assessment of cumulative traffic and transport impacts following the submission of the Sizewell C DCO application and will submit this to the Examination at Deadline 2.  The Councils are to review the note and confirm their position.
LA-10.22	Assessment Conclusions	The assessment conclusions of cumulative impacts with future projects are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Councils to review and confirm their position on this statement.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.23	Mitigation	With the exception of Friday Street, the mitigation set out within <b>Section 26.3.3</b> and the monitoring set out within <b>Section 26.3.4</b> of the ES (APP-074) is acceptable and sufficient to mitigate traffic and transport impacts to an acceptable level.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The mitigation will be further informed by a clarification note which the Applicants are preparing following the submission of the Sizewell C DCO application and will be submitted to the Examination at Deadline 3.  The Councils note that with the exception of the A12/A1094 Friday Street Junction, the proposed highway improvements are acceptable for the construction phase.
LA-10.24	Mitigation	The measures to reduce travel by single-occupancy vehicles presented within the <b>OTP</b> (APP-588) are acceptable and sufficient to mitigate traffic and transport impacts to an acceptable level.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils seek suitable monitoring and controls regarding vehicle occupancy and are unable to agree to this statement until the driver delay residual impact is agreed (see LA-10.16).
LA-10.25	Mitigation	The mitigation in relation to Friday Street Junction set out within the assessments and the proposals for a traffic light system coupled with speed limit reduction are acceptable and sufficient subject to detailed design and technical	Not Agreed – under discussion	Not Agreed – under discussion	Agreed	Agreed	The Applicants and the Councils are discussing whether it is appropriate for temporary speed limit reductions to be incorporated within the <b>draft DCO</b> (APP-023).  The Applicants have prepared a concept design for the temporary installation, operation and removal of traffic lights and associate



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		appraisal to mitigate traffic and transport impacts to an acceptable level.					highways signage at Friday Street junction. The Councils confirmed they are satisfied with the concept design and modelling and separately confirmed agreement in principle with the measures proposed. The Councils have indicated they would require a S278 agreement in due course to progress relevant technical approvals.
<b>Draft Development Consent Order (DCO)</b>							
LA-10.26	Wording of Requirement(s)	The wording of Requirement 16 with regard to Highway accesses provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a written scheme in accordance with the <b>OAMP</b> (APP-587) for the specification and management of vehicular access to a highway is acceptable and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants note that Article 13 of the <b>draft DCO</b> (APP-023) provides the Applicants the ability to form accesses to works, and Requirement 16 provides the mechanism for the relevant planning authority to approve the detail of the accesses to works. The construction of ‘any’ access requires the approval of details by the relevant planning authority in consultation with the relevant highway authority (as per Requirement 16 of the <b>draft DCO</b> (APP-023)).  The Applicants will update the <b>OAMP</b> (APP-587) to include relevant clauses from the <b>OCoCP</b> (APP-578) and the <b>OCTMP</b> (APP-586) to ensure that the traffic demand is managed.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Councils note that management plans are submitted for approval before commencement of onshore works, but this can exclude offsite highway works and other onshore preparation works. For clarity the Councils would desire that management plans are agreed before any highway works (including onshore preparation works) are commenced.</p> <p>This matter is under discussion.</p>
LA-10.27	Wording of Requirement(s)	The wording of Requirement 28 with respect to traffic management provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a CTMP and a travel plan is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils advise that in the event Sizewell C construction traffic conflicts with the Projects' onshore preparation works, the Applicants may find it difficult to deliver highway mitigation works (as the background traffic flow may be too high for daytime closures).</p> <p>The Applicants confirm that any highway mitigation works undertaken by the Applicants as onshore preparation works will be subject to approval by the relevant highway authority and will incorporate appropriate traffic management measures. The Applicants will continue to review the construction programme for the proposed Sizewell C New Nuclear Power Station to identify any potential conflicts.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							See further comments at LA-10.26.
LA-10.28	Wording of Requirement(s)	The wording of Requirement 36 with respect to development of a Port Travel Plan within the <b>draft DCO</b> (APP-023) (and supporting certified documents) is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils request that Requirement 36 include for a Port Traffic Management Plan (for the construction phase) and a Port Travel Plan (for the operational phase). Arrangements also need to be included in Requirement 36 for consultation with the Councils on the terms of any port travel plan in the event that the base port is located outside of their administrative areas. The Applicants are considering this request.  The Applicants will submit an Outline Port Travel Plan to Examination at Deadline 3.
LA-10.29	Draft DCO content	The streets included within Schedule 2 Streets subject to street works within the <b>draft DCO</b> (APP-023) are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Councils to review the relevant content within the <b>draft DCO</b> (APP-023) and confirm their position on this statement.
LA-10.30	Draft DCO content	The streets included within Schedule 5 Streets to be temporarily stopped up within	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Councils to review the relevant content within the <b>draft DCO</b> (APP-023) and confirm their position on this statement.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		the <b>draft DCO</b> (APP-023) are acceptable.					
LA-10.31	Draft DCO content	The accesses included within Schedule 6 Access to works within the <b>draft DCO</b> (APP-023) are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	Councils to review the relevant content within the <b>draft DCO</b> (APP-023) and confirm their position on this statement.
LA-10.32	Mitigation	The <b>OCTMP</b> (APP-586) embeds the commitments made in the ES and presents the requirements and standards that will be incorporated into the final CTMP.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants are discussing possible communication arrangements with Sizewell C in relation to traffic flows and traffic management.</p> <p>The Applicant will produce a quarterly traffic management report for submission to the Councils and will update the <b>OCTMP</b> (APP-586) to reflect this commitment.</p> <p>The Applicants note that enforcement measures are presented within the <b>OCTMP</b> (APP-586) but will update the <b>OCTMP</b> to include an incident management procedure / plan.</p> <p>The Councils will suggest wording for condition surveys and funding mechanisms for repairs for consideration by the Applicants and incorporation within the <b>OCTMP</b> (APP-586).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.33	Mitigation	The <b>OTP</b> (APP-588) sets out the principles of how construction personnel traffic would be managed and controlled.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants confirm the <b>OTP</b> (APP-588) will be updated in line with LA-10.06 and LA-10.07. Councils to review and confirm their position on this statement.
LA-10.34	Mitigation	The <b>OAMP</b> (APP-587) sets out detail on location, frontage, general layout, visibility and embedded mitigation measures for access points to the onshore development area. It presents the requirements and standards that will be incorporated into the final access design.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants note that the <b>draft DCO</b> (APP-023) provides the legislative mechanism to construct accesses, with Requirement 16 of the <b>draft DCO</b> requiring the Councils approval of final access design details.  The Applicants will update the <b>OAMP</b> (APP-587) to include relevant sections from the <b>OCoCP</b> (APP-578) and the <b>OCTMP</b> (APP-586) to ensure that the traffic demand is managed.  This Applicants respond to the matter of operational AIL routes at LA-10.36.
<b>Other Matters as Required</b>							
LA-10.35	Damages to highways	An agreement shall be entered into for the financial settlement of physical damages to highways surfaces, which will be	Not Agreed – under discussion	Not Agreed – under discussion	Not Agreed – under discussion	Not Agreed – under discussion	The Applicants will update the <b>OCTMP</b> (APP-586) with a methodology for the highways condition surveys and payments, the detail of which is not yet agreed.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		calculated based on a comparison of road surface condition identified through pre-construction and post-construction surveys.					This matter is under discussion between the Applicants and the Councils.
LA-10.36	Operational AIL Routes	The approach to securing designated AIL and HGV routes during the operation and decommissioning phase of the Projects is appropriate and acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils have in-principle concerns with the lack of national policy to address the management of AIL routes</p> <p>The Councils queried the concentration of operation and decommissioning phase AIL movements around the onshore substations and advised they would be seeking the AIL route is secured for future use.</p> <p>The Applicants confirm they are not seeking to protect AIL routes during operation or decommissioning. Rather, should AIL routes be required during operation or decommissioning, these will be agreed with the relevant authorities at the time in line with current Department for Transport processes.</p> <p>The Applicants have prepared a <b>Traffic and Transport: Deadline 1 Clarification Note</b> (document reference ExA.AS-8.D1.V1) to</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							address this matter which has been submitted to the Examination at Deadline 1.

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## 2.10 Human Health

44. The Projects have the potential to impact upon human health. **Chapter 27 Human Health** of the ES (APP-075) provides an assessment of the significance of these impacts.
45. **Table 22** provides an overview of consultation undertaken with the Councils regarding human health. It should be noted that consultation with regard to human health was primarily undertaken with Public Health England and The Planning Inspectorate. Further details on the stakeholder engagement process for human health can be found in the **Consultation Report** (APP-029).
46. Agreements concerning the existing environment, assessment methodology and assessment conclusions with respect to air quality, noise and vibration, traffic and transport and light pollution are provided in **Section 2.5**, **Section 2.8**, **Section 2.9**, and **Section 2.11** respectively.

Table 22 Summary of consultation with the Councils regarding human health

Date	Contact Type	Topic
Post-Application		
18 <sup>th</sup> March 2020	Written Correspondence	First draft SoCG issued to Councils
31 <sup>st</sup> July 2020	Written Correspondence	Applicants issued updated SoCG to Councils for comment
22 <sup>nd</sup> October 2020	Written Correspondence	Councils provided comments on SoCG

47. Whilst some progress has been made on matters raised by the Councils with regard to Human Health, it is noted that Covid-19 has resulted in delays to discussing the matters presented in this SoCG due to the Council's other commitments. For this iteration of the SoCG **Table 23** has not therefore been submitted and the Applicants and the Councils will further discuss and refine the statements and their positions regarding Human Health matters and will include an updated **Table 23** in the updated SoCG submitted at Deadline 3.



Table 23 Human Health

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-11.01	Existing Environment						
	Assessment Methodology						
	Assessment Conclusions						
	Mitigation						
<b>Draft Development Consent Order (DCO)</b>							
	Wording of Requirement(s)						
<b>Other Matters as Required</b>							



## 2.11 Offshore Seascape, Landscape and Visual Amenity

48. The offshore components of the Projects have the potential to impact upon seascape, landscape and visual amenity. **Chapter 28 Seascape, Landscape and Visual Amenity** of the ES (APP-076) provides an assessment of the significance of these impacts.
49. **Table 24** provides an overview of consultation undertaken with the Councils regarding seascape, landscape and visual amenity. Further details on the stakeholder engagement process for seascape, landscape and visual amenity can be found in the **Consultation Report** (APP-029).

**Table 24 Summary of consultation with the Councils regarding seascape, landscape and visual amenity**

Date	Contact Type	Topic
<b>Pre-Application</b>		
26 <sup>th</sup> June 2017	Meeting	Worst case scenario definition
7 <sup>th</sup> July 2017	Meeting	Assessment study area and viewpoint locations
27 <sup>th</sup> April 2018	Meeting	Method statement, assessment methodology and study area
24 <sup>th</sup> January 2019	Meeting	Presentation and discussion of assessment within PEIR
23 <sup>rd</sup> May 2019	Meeting	Presentation and discussion of updated design decisions regarding orientation and extent of the East Anglia TWO turbine array
<b>Post-Application</b>		
27 <sup>th</sup> February 2020	Meeting	SoCG Meeting 1
31 <sup>st</sup> July 2020	Meeting	SoCG Meeting 2

**Table 25** presents the matters agreed or not agreed between the Applicants and the Councils in relation to seascape, landscape and visual amenity.



**Table 25 Offshore Seascape, Landscape and Visual Amenity**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-12.01	Existing Environment	Sufficient survey data has been collected to appropriately characterise the baseline environment in terms of seascape, landscape and visual amenity and inform the assessment.	Agreed	Agreed	Agreed	Agreed	<p>Whilst the characterisation of the baseline environment is broadly acceptable, the Councils consider that the Applicants have over emphasised the contribution of existing offshore wind projects to the baseline.</p> <p>The Applicants do not consider that the contribution of existing offshore wind projects is over emphasised within the baseline.</p>
LA-12.02	Existing Environment	The viewpoints selected for the SLVIA are adequate and appropriate to understand and assess potential SVLIA effects.	Agreed	Agreed	Agreed	Agreed	None
LA-12.03	Existing Environment	The seascape assessment prepared in advance of the submission of the application adequately characterises the seascape of the study area and the contribution of existing arrays to that character.	Agreed	Agreed	Agreed	Agreed	<p>The seascape characterisation was prepared with input from the Applicants, the Councils and Natural England and therefore reflects an agreed baseline.</p> <p>Whilst the Applicants' characterisation of the baseline environment in the ES is broadly acceptable, the Councils consider that the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Applicants have over emphasised the contribution of existing offshore wind projects to the baseline.
LA-12.04	Assessment Methodology	With the exception of Viewpoint 10 (Sizewell Beach) and Suffolk Costal Path (Section 7), the sensitivity and importance of the receiving environment is accurately described within the ES.	Agreed	Agreed	Agreed	Agreed	None
LA-12.05	Assessment Methodology	The sensitivity and importance of the receiving environment at Viewpoint 10 (Sizewell Beach) and Suffolk Costal Path (Section 7), is accurately described within the ES.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree with the following judgements made by the Applicants:</p> <ul style="list-style-type: none"> <li>That the sensitivity of the receiving environment in the area around the Sizewell Nuclear Power Stations is medium, the Councils consider this should be high;</li> <li>That beach users and coastal path users are considered as having medium susceptibility to change for Viewpoint 10 Sizewell Beach due to the presence of Sizewell Nuclear Power Stations, the Councils consider this should be medium/high; and</li> <li>That the overall sensitivity to change comes out as Medium for this Area of Outstanding</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>Natural Beauty (AONB) sea view with the power stations behind the viewer, the Councils consider this should be high.</p> <p>The Councils are content for the Applicants to liaise with Natural England on this matter and will defer to Natural England's position.</p> <p>The Applicants are liaising with Natural England on this matter.</p>
LA-12.06	Assessment Methodology	The impact assessment methodologies used for the SLVIA provide an appropriate approach to assessing potential effects of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-12.07	Assessment Methodology	The Project alone worst case scenario presented in the SLVIA in terms of design parameters (i.e. the Rochdale Envelope) as set out in <b>Table 28.2, Chapter 28</b> of the ES (APP-076) is appropriate.	Agreed	Agreed	Agreed	Agreed	The Councils note that the maximum number of turbines is specified in Schedule 13 of the <b>draft DCO</b> (APP-023) as part of the Deemed Marine Licence (DML).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-12.08	Assessment Methodology	The study area defined for the SLVIA is appropriate to assess the potential effects of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-12.09	Assessment Methodology	The photomontages produced for the SLVIA meet appropriate standards and are suitable to inform judgements on the visual effect of the offshore infrastructure, while recognising that all photomontages have limitations as set out in <b>section 6.3.28.2, Appendix 28.2</b> of ES (APP-557).	Agreed	Agreed	Agreed	Agreed	None
LA-12.10	Assessment Conclusions	The conclusions of the assessment of effects for construction, operation and decommissioning presented within <b>Chapter 28</b> of the ES (APP-076) are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-12.11	Assessment Conclusions	With the exception of Viewpoint 10 (Sizewell Beach) and Suffolk Coastal Path (Section 7), the potential effects upon visual amenity identified in the SLVIA are accurate for each of the relevant receptors.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils defer to the expertise of Natural England on matters relating to receptor sensitivity and AONB special qualities.
LA-12.12	Assessment Conclusions	The potential effects upon visual amenity identified in the SLVIA for each of the relevant receptors at Viewpoint 10 (Sizewell Beach) are accurate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The sensitivity of the receiving environment in the area around Sizewell Nuclear Power Stations is not agreed (refer to LA-12.05). The Councils are content for the Applicants to liaise with the Natural England on this matter.  The Applicants are liaising with Natural England on this matter.
LA-12.13	Assessment Conclusions	Conclusions regarding effects upon the special qualities of the AONB within the SLVIA are accurate and appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils' position is that effects on the Special Qualities of the AONB have not been accurately assessed.  The Applicants are in ongoing discussions with Natural England on this matter, in which each of the assessment conclusions regarding the effects on AONB special qualities are being progressed separately.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-12.14	Assessment Conclusions	Conclusions regarding potential effects upon seascape character presented within the SLVIA are accurate and appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-12.15	Assessment Conclusions	The construction and operation of the East Anglia ONE North offshore infrastructure has no significant Project alone effects on natural beauty / special qualities of the AONB.	Not Applicable	Agreed	Agreed	Agreed	None
LA-12.16	Assessment Conclusions	The Suffolk Heritage Coast (shown on <b>Figure 28.13</b> (APP-327)), which overlaps with the coastal areas and estuaries of the AONB represents the part of the AONB most likely to experience significant effects from the East Anglia TWO project. Areas of the AONB outside the Suffolk Heritage	Agreed	Not Applicable	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Coast are unlikely to experience significant effects.					
LA-12.17	Assessment Conclusions	Within the AONB area covered by the Suffolk Heritage Coast, the spatial extent of potential significant effects of the East Anglia TWO windfarm site on views and character is geographically focused along the coastal edge landscape of the AONB, approximately between Covehithe in the north and Aldeburgh / Orford Ness in the south.	Agreed	Not Applicable	Agreed	Agreed	None
LA-12.18	Assessment Conclusions	Effects of the East Anglia TWO project's offshore infrastructure on the character and special qualities of the AONB are indirect effects due to the location of the windfarm offshore.	Agreed	Not Applicable	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-12.19	Assessment Conclusions	The effects of the East Anglia TWO windfarm site will be not significant on other AONB special qualities (those that are not categorised as 'natural beauty' indicators and are intangible for the purpose of assessment of seascape, landscape and visual effects) where the seascape setting is not a factor and the existing characteristics / special qualities will continue to define the character and distinctiveness of the AONB.	Agreed	Not Applicable	Agreed	Agreed	None
LA-12.20	Assessment Conclusions	The cumulative effects between East Anglia TWO and East Anglia ONE North have been adequately and appropriately described within the SLVIA and the conclusions are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The sensitivity of the receiving environment in the area around the Sizewell Nuclear Power Stations is not agreed (refer to LA-12.05 and LA-12.12). The Councils are content for the Applicants to liaise with Natural England on this matter.</p> <p>The effects on the Special Qualities of the AONB are not considered to have been accurately assessed (see LA-12.13).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Councils defer to the expertise of Natural England on these matters.</p> <p>The Applicants believe that East Anglia ONE North will not contribute to any significant cumulative SLVIA effects with East Anglia TWO, whereas East Anglia TWO may contribute to significant cumulative SLVIA effects with East Anglia ONE North.</p> <p>The Applicants have provided a response regarding the area around the Sizewell Nuclear Power Station in <b>Section 4.18, Volume 3</b> of the <b>Applicant's Comments on Relevant Representations</b> (AS-036) (ID 3.9.2).</p> <p>The Applicants are in ongoing discussions with Natural England on this matter, in which each of the assessment conclusions regarding effects on AONB special qualities are being progressed separately.</p>
LA-12.21	Assessment Conclusions	The cumulative effects with future projects have been adequately and appropriately described within the SLVIA and the conclusions are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils request that the Applicants provide an update to their CIA to take into consideration the Sizewell C DCO submission material. The Councils will then provide an update to their position on this matter.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Councils are aware of a number of future projects coming forward but understand at this stage that there is limited information known regarding their offshore layout and potential heights of turbines for an CIA to be completed</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.</p>
LA-12.22	Mitigation	The embedded mitigation set out within <b>Section 28.3.3</b> and monitoring set out within <b>Section 28.3.4</b> of the East Anglia ONE North ES (APP-076) is appropriate and sufficient.	Not Applicable	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils consider that the ES does not propose any monitoring. The Councils believe monitoring is important given the extent and scope of the net zero challenge by 2050 and the amount of wind turbines potentially required to be built. There is a need to monitor and verify the assessment conclusions and the effectiveness of mitigation to inform the design of future Projects.</p> <p>The Applicants notes the Councils' request for monitoring of the impact assessment and the effectiveness of mitigation to inform the design</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							of future projects and will discuss this at the next SoCG meeting. The Applicants do not consider it necessary to undertake monitoring of the SLVIA effects during operation of the Project.
LA-12.23	Mitigation	The embedded mitigation set out within <b>Section 28.3.3</b> and monitoring set out within <b>Section 28.3.4</b> of the East Anglia TWO ES (APP-076) is appropriate and sufficient.	Agreed	Not Applicable	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils support Natural England's view that insufficient embedded mitigation has been included within the design of East Anglia TWO.</p> <p>The ES does not propose any monitoring, but the Councils believe monitoring is important given the extent and scope of the net zero challenge by 2050 and the amount of wind turbines potentially required to be built. There is a need to monitor and verify the assessment conclusions and the effectiveness of mitigation to inform the design of future projects.</p> <p>The Applicants note that Natural England's principal concern in terms of the design of East Anglia TWO is the effect resulting from the height of the 300m high turbines representing the worst case scenario. The Applicants do however note that Natural England recognises the embedded mitigation that the revised design presents, that the revised layout design has added some embedded mitigation in the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>form of reduced lateral spread and avoidance of the 'curtaining' effect with East Anglia ONE North, which occurred with the PEIR layout.</p> <p>The Applicants note the Councils request for monitoring of the impact assessment and the effectiveness of mitigation to inform the design of future projects and will discuss this at the next SoCG meeting. The Applicants do not consider it necessary to undertake monitoring of the SLVIA effects during operation of the Project.</p>
LA-12.24	Mitigation	Maximum turbine tip heights of 282m (revised down from 300m as proposed in the Applications) represents an appropriate commitment to reduce SLVIA effects identified within the ES.	Agreed	Agreed	Agreed	Agreed	<p>The Councils agree that the reduction in height of the turbines will have reduced the effects, but it is not yet known to what degree without an updated assessment. It is also the Councils view that this is unlikely to have reduced the effects to a sufficient degree.</p> <p>The Councils defer to the expertise of Natural England on these matters.</p>
LA-12.25	Mitigation	A reduction in the East Anglia TWO windfarm site boundary from that presented in the Preliminary Environmental Information has reduced	Agreed	Not Applicable	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		seascape, landscape and visual effects of the East Anglia TWO windfarm site on setting and key coastal viewpoints of the AONB, primarily due to the reduction in the lateral spread of the revised layout on the sea skyline, in key viewpoints from the AONB.					
LA-12.26	Mitigation	The potential cumulative effect of the Projects windfarm sites has been reduced as a result of the revised East Anglia TWO windfarm site layout, through the creation of a clear gap in the seascape between the two Projects. This has effectively removed the possibility that a 'curtaining' effect would be apparent from certain viewpoints located on the coastline of the AONB.	Agreed	Agreed	Agreed	Agreed	The Councils agree that the revised site layout of East Anglia TWO has reduced the potential cumulative effects, but it is not considered they have reduced the effects to a sufficient degree.  The Councils defer to the expertise of Natural England on these matters.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Draft Development Consent Order</b>							
LA-12.27	Wording of Requirement(s)	The wording of Requirement 2 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to detailed offshore design parameters of wind turbine generators is appropriate in terms of the SLVIA Rochdale envelope.	Agreed	Agreed	Agreed	Agreed	The Councils note that the maximum number of turbines is specified in Schedule 13 of the <b>draft DCO</b> (APP-023) as part of the DML.
LA-12.28	Wording of Requirement(s)	The wording of Requirement 3 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to detailed offshore design parameters of offshore electrical platforms is appropriate in terms of the SLVIA Rochdale envelope.	Agreed	Agreed	Agreed	Agreed	The Councils agree that the wording of Requirement 3 complies with the number and sizes of the offshore electrical platforms, construction, operation and maintenance platforms and meteorological masts detailed as part of the SLVIA Rochdale envelope.  The Councils will defer to other statutory bodies in relation to the appropriateness of the number and sizes of the offshore structures.
LA-12.29	Wording of Requirement(s)	The wording of Requirement 31 provided within the <b>draft DCO</b> (APP-023) with reference to aviation lighting is	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils do not agree that the wording of the Requirement secures the operation of aviation lighting at the lowest permissible level.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		appropriate and sufficient to secure the operation of aviation lighting at the lowest permissible level.					During the multi-party workshop on 30 <sup>th</sup> July 2020, the Applicants noted a query from the Councils regarding how aviation lighting intensity is secured. The Applicants have reviewed the wording of Requirement 31 within the <b>draft DCO</b> (APP-023) and will amend it to secure the operation of aviation lights at the lowest permissible level. An updated <b>draft DCO</b> (APP-023) will be submitted during the Examination at Deadline 3.
LA-12.30	Wording of DMLs	The wording of article 3, Schedule 13 Part 1 of the <b>draft DCO</b> (APP-023) with reference to the maximum number of wind turbine generators is appropriate.	Agreed	Agreed	Agreed	Agreed	None
<b>Other Matters as Required</b>							
N/A							



## 2.12 Landscape and Visual

50. The onshore components of the project have the potential to impact upon landscape and visual. **Chapter 29 Landscape and Visual Impact Assessment** (LVIA) of the ES (APP-077) provides an assessment of the significance of these impacts.
51. **Table 26** provides an overview of consultation undertaken with the Councils regarding landscape and visual. Further details on the stakeholder engagement process for landscape and visual can be found in the **Consultation Report** (APP-029).

**Table 26 Summary of consultation with the Councils regarding landscape and visual**

Date	Contact Type	Topic
<b>Pre-Application</b>		
27 <sup>th</sup> April 2018	Meeting	Method statement, assessment methodology and study area
24 <sup>th</sup> January 2019	Meeting	Presentation and discussion of assessment within PEIR
23 <sup>rd</sup> May 2019	Meeting	Confirmation of assessment methodology and approach to mitigation for the ES
<b>Post-Application</b>		
27 <sup>th</sup> February 2020	Meeting	SoCG Meeting 1
31 <sup>st</sup> July 2020	Meeting	SoCG Meeting 2
7 <sup>th</sup> October 2020	Meeting	SoCG workshop

**Table 27** presents the matters agreed or not agreed between the Applicants and the Councils in relation to landscape and visual.



Table 27 Landscape and Visual

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-13.01	Existing Environment	Sufficient survey data has been collected to appropriately characterise the baseline environment in terms of landscape character and visual amenity and inform the assessment.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants and Councils agree that sufficient data has been collected to inform the assessment of visual effects. However, the Councils do not agree that the characterisation of the baseline landscape takes adequate account of key historic landscape features.</p> <p>The Applicant considers that the ES (<b>Section 29.5.2, Chapter 29</b> and <b>Appendix 29.3, Section 29.3.1</b>) (APP-077) appropriately characterised the baseline environment in terms of landscape character. The Applicants are preparing an <b>Archaeology and Cultural Heritage Clarification Note</b> (document reference ExA.AS-10.D1.V1) to address the Councils concern relating to historic landscape character and features, which will be submitted at Deadline 1.</p>
LA-13.02	Existing Environment	The viewpoints selected for the LVIA are adequate and appropriate to describe and	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		understand the existing environment.					
LA-13.03	Assessment Methodology	The impact assessment methodologies used for the LVIA provide an appropriate approach to assessing potential effects of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-13.04	Assessment Methodology	The viewpoints selected for the LVIA are adequate and appropriate to understand and assess the potential effects in terms of landscape character and visual amenity.	Agreed	Agreed	Agreed	Agreed	None
LA-13.05	Assessment Methodology	The Project alone worst case scenario in terms of design parameters (i.e. the Rochdale Envelope) as detailed in Table 29.2 and presented in the <b>LVIA</b> (APP-077) is appropriate.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-13.06	Assessment Methodology	The study area defined for the LVIA is appropriate to assess the potential effects of the Projects.	Agreed	Agreed	Agreed	Agreed	None
LA-13.07	Assessment Methodology	The receiving environment is accurately described within the ES.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Applicants and Councils agree that sufficient data has been collected to inform the assessment of visual effects. However, the Councils do not agree that the characterisation of the baseline landscape takes adequate account of key historic landscape features.</p> <p>The Applicant considers that the ES (<b>Section 29.5.2, Chapter 29</b> and <b>Appendix 29.3, Section 29.3.1</b>) (APP-077) appropriately characterised the baseline environment in terms of landscape character. The Applicants are preparing an <b>Archaeology and Cultural Heritage Clarification Note</b> (document reference ExA.AS-10.D1.V1) to address the Councils concern relating to historic landscape character and features, which will be submitted at Deadline 1.</p>
LA-13.08	Assessment Methodology	Notwithstanding the Councils position on growth rates and early planting, the	Agreed	Agreed	Agreed	Agreed	The Councils consider that the (draft) updated photomontages provide a more realistic representation of the planting proposed by the



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		photomontages produced for the LVIA meet appropriate standards and are suitable to inform judgements on visual effect of the onshore infrastructure, while recognising that all photomontages have limitations as set out in <b>section 6.3.29.2, Appendix 29.2</b> to the ES (APP-566).					Applicants, however, the Councils' position is that the growth rates proposed by the Applicants are optimistic. The Applicants will submit a selection of updated photomontages at Deadline 3.  Matters in relation to mitigation planting growth rates adopted for the assessment and early planting proposals have been treated separately, remain not agreed and remain under discussion with the Councils (see LA-13.11, LA-13.15, LA-13.16, LA-13.26).
LA-13.09	Assessment Methodology	The assessment of effects for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-13.10	Assessment Conclusions	The potential effects of the landfall and onshore cable route identified in the LVIA are accurate for each of the relevant receptors.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-13.11	Assessment Conclusions	The potential effects of the onshore substations identified in the LVIA are accurate for each of the relevant receptors.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree the proposed growth rates are realistic and consider the assumptions made are optimistic and that the heights of planting will not necessarily be achievable within the timeframes set out (i.e. 15-years post-construction).</p> <p>The Applicants do not agree with the Councils position and consider that the assumed growth rates (height) of woodlands at Year 15 are within a realistic and achievable range. This is considered a matter of judgement.</p> <p>This matter remains under discussion.</p>
LA-13.12	Assessment Conclusions	The onshore substations and National Grid infrastructure associated with the East Anglia TWO and East Anglia ONE North projects have no significant effects on the natural beauty / special qualities of the AONB.	Agreed	Agreed	Agreed	Agreed	None
LA-13.13	Assessment Conclusions	Significant effects on AONB special qualities are limited to the temporary construction	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		activities associated with the onshore cable route within or close to Section 1 of the onshore cable corridor and the landfall area (as shown on <b>Figure 6.2a</b> (APP-097).					
LA-13.14	Assessment Conclusions	Landscape and visual effects associated with the onshore cable route and landfall are considered temporary and will be reinstated, with no significant long-term operational effects on AONB natural beauty / special qualities arising.	Agreed	Agreed	Agreed	Agreed	This is agreed subject to appropriate discharge of relevant requirements post-consent.
LA-13.15	Assessment Conclusions	The conclusions of the LVIA accurately reflect the potential effects on the receiving environment within the study area.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree the proposed growth rates are realistic and consider the assumptions made are optimistic and that the heights of planting will not necessarily be achievable within the timeframes set out (i.e. 15-years post-construction).</p> <p>The Applicants do not agree with the Councils position and consider that the assumed growth rates (height) of woodlands at Year 15 are</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>within a realistic and achievable range. This is considered a matter of judgement.</p> <p>This matter remains under discussion.</p>
LA-13.16	Assessment Conclusions	The cumulative effects between East Anglia TWO and East Anglia ONE North have been adequately and appropriately described within the LVIA and the conclusions are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils do not agree the proposed growth rates are realistic and consider the assumptions made are optimistic and that the heights of planting will not necessarily be achievable within the timeframes set out (i.e. 15-years post-construction).</p> <p>The Applicants do not agree with the Councils position and consider that the assumed growth rates / height of woodlands at Year 15 are within a realistic and achievable range. This is considered a matter of judgement.</p> <p>This matter remains under discussion.</p>
LA-13.17	Assessment Conclusions	The cumulative effects with future projects have been adequately and appropriately described within the LVIA and the conclusions are appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.</p>
LA-13.18	Mitigation	The embedded mitigation set out within <b>section 29.3.3</b> and monitoring set out within <b>section 29.3.4</b> of the <b>ES</b> (APP-077) and illustrated in the <b>Outline Landscape Mitigation Plan</b> (shown on <b>Figures 29.11a-b</b> and <b>29.12</b> (APP-401 to APP-403) is appropriate and sufficient.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request every reasonable opportunity to reduce the impact of the substations is explored including consolidation of the infrastructure. The Councils request a clear commitment in the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) to make all reasonable effort to reduce the size and scale of the substations at the detailed design stage.</p> <p>The Applicants note that the DCO would authorise the Projects within specified maximum parameters, although it is noted that the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) and <b>Outline National Grid Substation Design Principles Statement</b> (submitted at Deadline 1 (document reference ExA.AS-6.D1.V1)) provide for various design principles, including a statement that the substations should be sensitively placed, with visual impacts minimised as far as possible by</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							the use of appropriate design, building materials, shape, layout, coloration and finishes.  This matter remains under discussion.
LA-13.19	Mitigation	The undergrounding of the onshore cabling in its entirety provides one form of appropriate and necessary mitigation of potential landscape and visual effects during operation of the Projects.	Agreed	Agreed	Agreed	Agreed	The Councils' agreement of this statement is subject to a suitable scheme of restoration.
LA-13.20	Mitigation	The Applicants have proposed all reasonable mitigation measures to minimise the landscape and visual effects during the construction phases of the Projects constructed simultaneously (Scenario 1).	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-13.21	Mitigation	The Applicants have proposed all reasonable mitigation measures to minimise the landscape and visual effects during the construction phases of the Projects constructed sequentially (Scenario 2).	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request the Projects are constructed simultaneously in order to minimise the duration of effects and for this to be secured through a new requirement in the <b>draft DCO</b> (APP-023). If constructed sequentially, the Councils request that the first project lays the ducting for the second project's cabling and for this to be secured through a requirement in the DCOs.</p> <p>The Applicants are not able to commit to simultaneous construction of the Projects.</p>
LA-13.22	Mitigation	The proposed pre-construction surveys and re-planting proposals (including planting of hedgerow trees) within the onshore cable route as presented within the <b>OLEMS</b> (APP-584) and secured through the <b>draft DCO</b> (APP-023) (Requirement 14 and Requirement 15) is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils seek clarification regarding early planting and how this is secured in addition to how the onshore preparation works which includes pre-planting of landscaping works relates to Requirement 14.</p> <p>The Applicants are discussing early planting with the Councils. Details will be included in an updated <b>OLEMS</b> (APP-584) which will be submitted at Deadline 3.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-13.23	Mitigation	The Applicants have proposed all reasonable mitigation measures to minimise the operational landscape and visual effects of the cable corridor.	Agreed	Agreed	Agreed	Agreed	<p>The Councils agree this statement subject to the avoidance of unnecessary tree removal and excessive hedge removal.</p> <p>The Applicants confirm that avoidance of unnecessary tree removal and excessive hedge removal will be one of the considerations in finalising the onshore cable route.</p>
LA-13.24	Mitigation	The Applicants have proposed all reasonable mitigation measures to minimise the landscape and visual effects of the permanent onshore substations.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request every reasonable opportunity to reduce the impact of the substations is explored including consolidation of the infrastructure. The Councils request a clear commitment in the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) to make all reasonable effort to reduce the size and scale of the substations at the detailed design stage.</p> <p>The Applicants note that the DCO would authorise the Projects within specified maximum parameters, although it is noted that the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) and <b>Outline National Grid Substation Design Principles Statement</b> (submitted at Deadline 1 (document reference ExA.AS-6.D1.V1)) provide for various</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							design principles, including a statement that the substations should be sensitively placed, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, coloration and finishes.  This matter remains under discussion.
LA-13.25	Mitigation	The tree species for woodland and hedgerow planting set out in the <b>OLEMS</b> (APP-584) are suitable for the proposed mitigation planting.	Agreed	Agreed	Agreed	Agreed	None
LA-13.26	Mitigation	The proposed mitigation planting within the <b>OLEMS</b> (APP-584) is based on appropriate and realistic growth rates, as presented within <b>Chapter 29 Landscape and Visual Impact Assessment</b> of the ES (APP-077).	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils consider that the Applicants assumptions of planting growth rates (heights) of mitigation planting at Year 15 are optimistic and that the heights of planting will not necessarily be achievable within the timeframes set out (i.e. 15-years post-construction).  The Applicants do not agree with the Councils position and consider that the assumed growth rates (height) of woodlands at Year 15 are within a realistic and achievable range. This is considered a matter of judgement.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							This matter remains under discussion.
LA-13.27	Mitigation	Effects on reinstatement, mitigation, and early planting resulting from the different sequencing of the Projects are clear.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils seek clarification regarding the effects on reinstatement, mitigation, and early planting as a result of sequential construction.  The Applicants are discussing early planting with the Councils. Details will be included in an updated <b>OLEMS</b> (APP-584) which will be submitted at Deadline 3.
<b>Draft Development Consent Order</b>							
LA-13.28	Wording of Requirement(s)	The wording of Requirement 14 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a written landscape management plan and associated work programme for the mitigation and monitoring of potential landscape and visual effects is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	See statements LA-13.27 and LA-13.31.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-13.29	Wording of Requirement(s)	The wording of Requirement 15 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to the implementation and maintenance of landscaping secured through Requirement 14 is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	None
LA-13.30	Wording of Requirements	The wording of Requirement 12 provided within the <b>draft DCO</b> (APP-023) with reference to onshore detailed design parameters is appropriate and sufficient.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request the National Grid infrastructure is subject to a Design Principles Statement and Requirement 12(6) is reworded to reflect this. The Councils request that the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) should include a commitment to make every effort to reduce the size and scale of the substation infrastructure during the post consent design refinement process.</p> <p>The Applicants note that the DCO would authorise the Projects within specified maximum parameters, although it is noted that the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) and <b>Outline</b></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p><b>National Grid Substation Design Principles Statement</b> (submitted at Deadline 1 (document reference ExA.AS-6.D1.V1)) provide for various design principles, including a statement that the substations should be sensitively placed, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, coloration and finishes.</p> <p>The Applicants will submit an updated <b>draft DCO</b> (APP-023) at Deadline 3. This matter remains under discussion.</p>
<b>Other Matters as Required</b>							
LA-13.31	Wording of <b>OLEMS</b> (APP-584)	The wording contained within the <b>OLEMS</b> (APP-584) is appropriate and adequate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the <b>OLEMS</b> (APP-584) be updated in relation to tree removal; ensure consistency with finished floor levels started in <b>Outline Onshore Substation Design Principles Statement</b> (APP-585); clarify discrepancies between hedgerows identified to be crossed with reduced widths or removed in Annexe 1 of the <b>OLEMS</b> compared to those in Schedule 11; clarify how early planting will be secured.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Applicants will prepare a felling plan as part of the final Landscape Management Plan detailing the existing trees to be removed.</p> <p>The Applicants will clarify the discrepancies between reduced-width hedgerow crossings stated within the <b>OLEMS</b> (APP-584) and Schedule 11 of the <b>draft DCO</b> (APP-023), as well as review and correct the differences in onshore substation finished floor levels between the <b>OLEMS</b> (APP-584) and the <b>Outline Onshore Substation Design Principle Statement</b> (APP-585).</p> <p>The Applicants are discussing early planting with the Councils. Details will be included in an updated <b>OLEMS</b> (APP-584) which will be submitted at Deadline 3.</p> <p>The Councils will review their position following updates to the <b>OLEMS</b> and outcome of further discussions with the Applicants.</p>
LA-13.32	Long Term Management of Site	The Councils request that a long-term management plan be provided, and Community Liaison Group be established	Not Agreed – under discussion	Not Agreed – under discussion	Agreed	Agreed	The Councils request that a long-term management plan is secured for the site which details how the site will be managed until decommissioning. The Applicants will update the <b>OLEMS</b> (APP-584) to outline management



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		in relation to the Grove Wood, Friston substation site.					<p>arrangements for the mitigation planting during the operational phase of the Projects. The updated <b>OLEMS</b> (APP-584) will be submitted at Deadline 3.</p> <p>The Councils also request the establishment of a community liaison group to provide a forum between the site operators, local community and Councils regarding the management and operation of the site.</p> <p>The Applicants do not agree with the Councils' position that a community liaison group between the operators, local community and the Councils is necessary.</p> <p>However, the Applicants are committed to ensuring means of communication between the Project and the Councils and community representatives as is usually provided for such projects.</p>



## 2.13 Tourism, Recreation and Socio-Economics

### 2.13.1 Tourism

52. The Projects have the potential to impact upon tourism and recreation. **Chapter 30 Tourism, Recreation and Socio-Economics** of the ES (APP-078) provides an assessment of the significance of these impacts.
53. **Table 28** provides an overview of consultation undertaken with the Councils regarding tourism. Further details on the stakeholder engagement process for tourism can be found in the **Consultation Report** (APP-029).

**Table 28 Summary of Consultation with the Councils Regarding Tourism and Recreation**

Date	Contact Type	Topic
<b>Pre-Application</b>		
12th June 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
24 <sup>th</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
<b>Post-Application</b>		
4 <sup>th</sup> August 2020	Meeting	SoCG Meeting 1

54. **Table 29** presents the matters agreed or not agreed between the Applicants and the Councils in relation to tourism.



Table 29 Tourism

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-14.01	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils requested on the 12<sup>th</sup> June 2018 during an ETG meeting that the Applicants commission a relevant study or visitor survey, but this has not been undertaken.</p> <p>Given the scale of the Projects the Applicants did not consider it necessary to undertake a dedicated visitor survey as this has not been required for similar scale projects previously. Given the temporary nature and limited geographic extent of the works there are few pathways for impacts on tourism. It is the view of the Applicants that the assessment presented in <b>Chapter 30 Tourism, Recreation and Socio-Economics</b> (APP-078) is proportionate to the potential impacts of the Projects and comprehensive.</p> <p>The Applicants have been in consultation with The Suffolk Coast Destination Management Organisation (DMO) since early 2018 (see <b>Consultation Report, Table 4.7</b> (APP-029)). The Applicants would have included the findings of The Energy Coast report (as cited in the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							DMO's Relevant Representation (RR-082) within the EIA if available within the timescales of the Projects' assessment. It is the Applicants' view that this would have provided extra context on receptor sensitivity (taken as a generalised Suffolk coast visitor) but not ultimately changed the conclusions of the impacts of the Projects.
LA-14.02	Existing Environment	Sufficient desk-based evidence has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-14.03	Existing Environment	The ES adequately characterises the baseline environment in terms of tourism.	Agreed	Agreed	Agreed	Agreed	The Councils acknowledge that at the time of writing, the ES adequately characterised the baseline environment.  All parties acknowledge that the situation with Covid-19 will have unknown implications for the tourism sector.
LA-14.04	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project (excluding impacts in relation	Agreed	Agreed	Agreed	Agreed	The Councils view is that the methodology and data sources proposed for assessing impacts on tourist accommodation are appropriate subject to the Applicants' agreement to update their CIA following acceptance of the Sizewell C DCO application.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		to visitor perceptions discussed at LA-14.05).					<p>The Applicants have submitted a <b>Socio-Economics and Tourism Clarification Note</b> detailing any changes in assumptions within the Projects' Applications since acceptance of the Sizewell C DCO application at Deadline 1 (document reference ExA.AS-17.D1.V1).</p> <p>The Applicants and Councils position on PRoW are provided in <b>Table 31</b> of this SoCG.</p>
LA-14.05	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts in relation to visitor perceptions.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils believe the impacts of visitor perceptions and propensity to visit have not been evaluated (no recent surveys of visitors/businesses have been carried out for example). Instead the Councils view is that the Applicants have referenced windfarm surveys from other areas of the country that are (a) out of date, and (b) do not cover areas similar to east Suffolk and the unique AONB offer to visitors in this area.</p> <p>The Applicants consider that given the temporary nature and limited geographic extent of the construction effects of the Projects, the sources of information and methodology used in the desk-based assessment were proportionate and appropriate.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Further information has been provided within the <b>Socio-Economics and Tourism Clarification Note</b> submitted to the Examination at Deadline 1 (document reference ExA.AS-17.D1.V1).
LA-14.06	Assessment Methodology	The worst case scenario ( <b>section 30.3.2</b> of <b>Chapter 30 Tourism, Recreation and Socio-Economics</b> ) (APP-078) in terms of construction working hours, peak personnel numbers and construction programme ( <b>Table 30.2</b> ) presented in the assessment is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-14.07	Assessment Conclusions	The impact assessment conclusions for construction and decommissioning presented are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils agree that the impact assessment conclusions in relation to local accommodation business is appropriate.</p> <p>The Councils disagree with the impact assessment conclusions in relation to tourist perception impacts.</p> <p>The Applicants consider that the assessment of visitor perception effects is appropriate given that:</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<ul style="list-style-type: none"> <li>The first pathway for visitor perception impact is from direct impacts upon tourism and recreation assets during construction. The assessment (APP-078) also takes account of construction effects from transport and these have been fully assessed in <b>Chapter 26 - Traffic and Transport</b> (APP-074). No significant adverse effects are predicted after mitigation described in the inter-related chapters (i.e. <b>Chapter 19 Air Quality</b> (APP-067), <b>Chapter 20 Water Resources and Flood Risk</b> (APP068), Chapter 25 <b>Noise and Vibration</b> (APP-073) Chapter 26 <b>Traffic and Transport</b> (APP-074)).</li> <li>The second pathway is from the perception of large-scale developments as being an adverse impact on the area as a tourist destination. Although the Projects are a Nationally Significant Infrastructure Projects, they are not iconic projects (such as Crossrail, Sizewell C New Nuclear Power Station, Heathrow Airport), and unlikely to be widely known or understood as a distinct project by the general public or visitors.</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-14.08	Assessment Conclusions	The impact assessment conclusions presented for the operation phase are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils agree that once constructed, the Projects will not necessarily provide a visual deterrent to visitors but the impact during construction on perceptions could translate to a reduction in people's willingness to visit in the future.</p> <p>The Applicants consider that given the impact of construction disturbance 'Scenario 2 (sequential construction)' on tourism and recreation is not significant (<b>Table 30.85</b> of <b>Chapter 30 Tourism, Recreation and Socio-Economics</b>, (APP-078)) there would be no pathway for the impact envisaged by the Councils. This is considered to be the worst-case construction scenario in respect of disturbance on tourism and recreation because it represents a longer duration and has a greater chance to interact with more projects, assuming similar levels of residual impacts of determinants.</p>
LA-14.09	Assessment Conclusions	The assessment of cumulative impacts between the Projects are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils agree that the impact assessment conclusions in relation to local accommodation business is appropriate.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Councils disagree with the impact assessment conclusions in relation to tourist perception impacts.</p> <p>As referred to above (see LA-14.08) regarding Scenario 2, the Applicants' view is that visitor perception impacts would not be significant (<b>Table 30.85 of Chapter 30 Tourism, Recreation and Socio-Economics</b> (APP-078)).</p>
LA-14.10	Assessment Conclusions	The assessment of cumulative impacts with the proposed Sizewell C New Nuclear Power Station is acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the Applicants update their CIA with information from the Sizewell C DCO application.</p> <p>The Applicants have submitted a <b>Socio-Economics and Tourism Clarification Note</b> comparing the assumptions used for Sizewell C contained within the Projects' Applications, with the now published Sizewell C material at Deadline 1 (document reference ExA.AS-17.D1.V1). However, the CIA presented by the Applicants assumes that there is potential for significant impacts from Sizewell C, therefore the Applicants note that there is no change to the conclusions.</p> <p>The Councils consider that Local DMO evidence from the 2019 visitor and business survey</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>suggests that the cumulative visitor deterrence impact of energy projects will be significant.</p> <p>The 2019 DMO Visitor and Business Survey produced by BVA-BDRC assessed the cumulative impact of both Sizewell C and the Projects. The study concluded that the net effect would be for a negative impact on visitor perceptions and a 17% reduction in willingness to visit the area. This particularly applied to those potential visitors who had not visited before (the future tourism visitor market for East Suffolk) who consider the developments would negatively impact on the peace, tranquillity and natural environment of the area.</p> <p>The Councils consider that, although the Applicants have referred to a National Grid (2014) study in their ES, the study is not specific to Suffolk and is not as up to date as the DMO visitor and business survey.</p> <p>The Applicants do not endorse the conclusions on impact presented within the DMO Report. The Applicants note however that it does provide context of receptor sensitivity and visitor attitudes. As previously noted, consideration of this context would not affect the conclusions of</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>the project alone assessment (Scenario 2) (see LA-14.07) or cumulative impact of the Projects (Scenario 1). The Sizewell C project itself has potential to result in significant impacts and this drives any significant cumulative impact, as recognised by the provision of the mitigation package proposed for the Sizewell C project.</p> <p>The Councils are also concerned about the cumulative impact of the Projects with Sizewell C on tourist accommodation during peak season, particularly if the accommodation sector suffers long-term damage from Covid-19.</p> <p>The Applicants will provide a clarification note comparing the assumptions used for Sizewell C contained within the Projects' Applications, with the now published Sizewell C material and any relevant changes regarding accommodation impacts.</p>
LA-14.11	Assessment Conclusions	The assessment of cumulative impacts with proposed future projects is acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils maintain that future energy projects which have been (or are likely to be) granted grid connection offers by NGESO within the same locality should be included in the CIAs for the Projects. It is however acknowledged that information in relation to worker numbers and accommodation needs is not yet known. It is</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>however requested that should further information become available the CIA in the ES should be updated in relation to this matter.</p> <p>The Councils are concerned that the development of further projects in the locality is likely to exacerbate the findings of the DMO study (2019), especially projects constructed within the same timeframe.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17.</p> <p>See paragraph 13 of this SoCG for further information on the Councils' and Applicants' position on the CIA.</p> <p>Should any future projects progress to the consent stage they would be expected to consider worker numbers and accommodation needs as part of their consent process.</p>
LA-14.12	Mitigation	The proposed enhancements, mitigation and monitoring set out within <b>Section 30.3.3</b> and <b>Section 30.3.4</b> of the ES	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils consider that local evidence suggests cumulative impact of major energy projects on visitor perception of the Suffolk Coastal area may be significant. The Councils are of the view that mitigation/positive action is



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		(APP-078) is appropriate and sufficient.					<p>needed to promote positive messages to this target audience over the period of disruption. The Councils therefore request the provision of a Tourism Fund to fund marketing and PR campaigns focusing on the impacted areas.</p> <p>The Applicants do not agree with the Councils views stated and have responded to this point within the notes at LA-14.14.</p> <p>The Applicants note however that the mitigation proposed in <b>section 30.3.3 of Chapter 30 Tourism, Recreation and Socio-Economics</b> of the ES (APP-078) refers to the use of best practice and techniques to avoid or reduce individual impacts which could affect tourism indirectly. This includes:</p> <ul style="list-style-type: none"> <li>Noise and Vibration measures set out in the <b>OCoCP</b> (APP-578),</li> <li>Landscape and Visual mitigation outlined in the <b>OLEMS</b> (APP-584); and</li> <li>Traffic and Transport measures outlined in the <b>Outline Travel Plan</b> (APP-588) and <b>Outline Access Management Plan</b> (APP-587).</li> </ul> <p>The Applicants consider that with the exception of highly localised significant visual impacts</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							around the onshore substations at Grove Wood, the impacts for the above EIA topics are not significant.
<b>Draft Development Consent Order</b>							
LA-14.13	None	None	Not applicable	Not applicable	Not applicable	Not applicable	None
<b>Other Matters as Required</b>							
LA-14.14	Tourism Fund	Establishing a Tourism Fund with the Councils which would be utilised to promote the locality during construction of the Projects is an effective means of addressing the potential adverse impacts on visitor perceptions arising during construction.	Not Agreed – under discussion	Not Agreed – under discussion	Agreed	Agreed	<p>The Councils consider that a Tourism Fund would address the potential adverse impacts on visitor perceptions arising during construction of the Projects, which is likely to reduce visitors' willingness to visit in the future by providing funding to promote the locality.</p> <p>It is the Applicants' view that the Projects will not have significant impacts upon visitor perception during construction as they are not iconic projects likely to be in the public mind and direct impacts which could affect visitors already present in the area will be mitigated to not significant levels.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The provision of a Tourism Fund is currently under consideration by the Applicants.

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### 2.13.2 Recreation (Public Rights of Way)

55. The Projects have the potential to impact upon PRow. **Chapter 30 Tourism, Recreation and Socio-Economics** of the ES (APP-078) provides an assessment of the significance of these impacts.
56. **Table 30** provides an overview of consultation undertaken with the Councils regarding PRow. Further details on the stakeholder engagement process for PRow can be found in the **Consultation Report** (APP-029).

**Table 30 Summary of consultation with the Councils regarding tourism, recreation and socio-economics**

Date	Contact Type	Topic
<b>Pre-Application</b>		
12 <sup>th</sup> June 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
24 <sup>th</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
<b>Post-Application</b>		
18 <sup>th</sup> March 2020	Meeting	SoCG Meeting 1
14 <sup>th</sup> July 2020	Meeting	SoCG Meeting 2
28 <sup>th</sup> September 2020	Meeting	SoCG Meeting 3

57. **Table 31** presents the matters agreed or not agreed between the Applicants and the Councils in relation to PRow.



Table 31 Public Rights of Way

ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-15.01	Existing Environment	Sufficient desk-based data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils consider that Chapter 30 does not provide any description of the nature, relative importance in the access network and level of use of each PRoW.</p> <p>The existing value and character of the landscape is considered in <b>section 29.5.2</b> (APP-077) and PRoWs where receptors may experience a loss in visual amenity are identified in <b>section 29.5.4.2</b>.</p> <p>Those PRoWs that are listed in <b>Chapter 30 Tourism, Recreation and Socioeconomics</b> (APP-078) as potentially affected are those that fall within the Order limits. Schedule 3 and Schedule 4 of the <b>draft DCO</b> (APP-023) provide a full list of the PRoWs that will be affected by the Projects.</p>
LA-15.02	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	The Councils consider that access and amenity should be assessed as a subject in its own right rather than divided across different ES chapters and consider that a single assessment should include both an



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		potential impacts of the Projects.					<p>assessment of the impact on the physical resource and on the quality of the experience that members of the public have when using the PRow, such as the changes to views, changes to noise, air quality, presence of construction traffic, loss of historical context and tranquillity.</p> <p>The Councils consider that the lack of a holistic approach to assessing the impact on both the physical resource and the experience and perception of users results in an underestimate of the impact particularly at the substation site and inconsistencies between conclusions reached in other chapters (Chapter 30 and Chapter 29 LVIA).</p> <p>The Councils consider that the methodology employed in Chapter 30 is inappropriate for PRow. Using a methodology suited for tourism businesses and accommodation providers does not reflect the actual value and sensitivity of the PRow network as a whole. Users do not just use a single PRow, they use the interconnected network.</p> <p>The impact assessments with regards to PRow have followed a conventional 'source-</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>pathway-receptor' model which identifies potential impacts resulting from the proposed activities on the environment and sensitive receptors within it.</p> <p>The Applicants have produced a <b>Public Rights of Way Clarification Note</b> (document reference ExA.AS-9.D1.V1) which provides an overview of the assessment method and a summary of potential impacts considered for PRoWs, signposting information from the various ES Chapters and drawing on PRoW documents submitted with the Applications. This clarification note has been submitted to the Examination at Deadline 1.</p>
LA-15.03	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils cannot reach an informed view as there is insufficient information provided by the Applicants as to the duration and timing of the temporary closures and permanent closures.</p> <p>The Applicants have advised the Councils that it is not possible to identify the precise duration of PRoW closures as this can only be established at the detail design stage, and note that the <b>Outline PRoW Strategy</b> (APP- 581) states that “Typically, PRoW along the onshore</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p><i>cable route will be periodically diverted for a short period of time (a number of weeks depending on the length of PRoW being temporarily closed) to allow for the safe construction of the onshore infrastructure (including haul road construction and removal)."</i></p> <p>It is also noted that prior to commencing works that would affect a PRoW listed in Schedule 3 or Schedule 4 of the <b>draft DCO</b> (APP-023) the relevant planning authority must have approved the PRoW Strategy. This is secured under Requirement 32 of the <b>draft DCO</b> (APP-023).</p>
LA-15.04	Assessment Conclusions	The conclusions of the assessment of impacts for each project are consistent with the accepted assessment methodologies.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils consider that the conclusions are consistent with the methodologies used but the Council considers that the methodologies used are insufficient because they do not adequately address baseline usage and they do not consider amenity or user experience values of the PRoW affected individually or as a network serving a local population.</p> <p>The Applicants note that as the ES follows the source-pathway-receptor model, it has therefore assessed impacts on users of PRoW</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>(i.e. users of the PRoW are the receptors as opposed to the PRoW itself).</p> <p>In particular, amenity value of PRoWs is assessed in <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077), specifically <b>section 29.6.1.3.1</b> and <b>section 29.6.2.2.1</b> (APP-077).</p>
LA-15.05	Assessment Conclusions	The impact assessment conclusions for construction, operation and decommissioning (associated with the temporary closures of PRoW along the onshore cable corridor) presented are acceptable.	Agreed	Agreed	Agreed	Agreed	<p>The Councils accept that the conclusions are reasonable for most of the temporary closures and the provision of alternative routes along the onshore cable route.</p> <p>The Applicants note that the detail of the interface between the temporary PRoW diversion, B1069 and the onshore cable route will be defined within the PRoW Strategy which requires approval from the relevant planning authority under Requirement 32 of the <b>draft DCO</b> (APP-023).</p> <p>The Applicants and Councils are discussing amendments to the PRoW arrangements at the onshore substation location which will remove the interface between the permanent PRoW Diversion, Grove Road and onshore cable route.</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-15.06	Assessment Conclusions	The impact assessment conclusions for construction, operation and decommissioning (associated with the onshore substation location) presented are acceptable	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils' view is that the methodology and approach taken by the Applicants is inappropriate resulting in inconsistent conclusions in different chapters of the ES</p> <p>The Councils accept the conclusion in the LVIA that there will be a significant visual impact for users during construction and operation and that this remains significant after 15yrs post construction.</p> <p>However, the Councils disagree with the conclusion in Chapter 30 that the permanent diversion of the public footpath could result in a significant impact, but this will be mitigated by the permanent diversion and landscaping and thus there will be a negligible residual impact over the long term. The concerns include the effectiveness of the mitigation planting.</p> <p>These differing conclusions are inconsistent as a result of the different methodologies. The Councils are concerned that the lack of a holistic approach is giving rise to contradictory conclusions and subsequent lack of mitigation or compensation. It is noted that there are no</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>measures for Public Rights of Way in the Mitigation Schedule.</p> <p>In addition, the LVIA does not actually assess the visual impact for users on the proposed new public right of way and there are no illustrative viewpoints used from this proposed route.</p> <p>The Applicants are continuing to work with the Councils regarding this matter.</p>
LA-15.07	Assessment Conclusions	The assessment of cumulative impacts between East Anglia TWO and East Anglia ONE North are acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	None
LA-15.08	Assessment Conclusions	The assessment of cumulative impacts with the proposed Sizewell C is acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	None
LA-15.09	Assessment Conclusions	The assessment of cumulative impacts with proposed future projects is acceptable.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	None



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-15.10	Mitigation	The embedded mitigation set out within Section 30.3.3 and Section 30.3.4 of the <b>ES</b> (APP-078) is appropriate and sufficient in terms of PRoW.	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils broadly accept the principles in the <b>Outline PRoW Strategy</b> (APP-581) for the management of the temporary closures for taking forward to the detailed PRoW strategy as per Requirement 32 of the <b>draft DCO</b> (APP-023).</p> <p>Clarification has been sought by the Councils as to the management of the bridleway at the entrance to the Construction Consolidation Site and haul road (Work Nos. 26 and 27)</p> <p>The Applicants advise that the detail of the interface between the temporary PRoW diversion, B1069 and the onshore cable route will be defined within the PRoW Strategy which requires approval from the relevant planning authority.</p> <p>The Applicants and Councils are considering the following amendments to the PRoW arrangements at the onshore substation location:</p> <ul style="list-style-type: none"> <li>Removal of the interface between the permanent PRoW Diversion, Grove Road and onshore cable route and establishment of this PRoW on completion of construction;</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<ul style="list-style-type: none"> <li>• Provision of a dedicated area as amenity space for PRow users for a period of 10 years from establishment (establishment to be early in the Projects' construction period);</li> <li>• Expansion of the Order limits to allow the realignment of the northern section of PRow E-260/017/0 along its historic path (as recorded in 1883/84 historic mapping).</li> <li>• Amendment of a permanent PRow diversion to route away from the westernmost cable sealing compound;</li> <li>• Amendment of the permanent PRow diversion route away from the edge of Grove Road and incorporation further within the proposed landscape planting;</li> <li>• A new permanent PRow to the north of Laurel Covert to connect to existing PRow east of Grove Road;</li> <li>• Additional landscaping along permanent PRow diversion boundaries, in particular on the PRow to the north of the National Grid infrastructure;</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<ul style="list-style-type: none"> <li>Acknowledgement that permanent PRow routes should be designed as headland paths and not subject to ploughing where possible;</li> <li>New hedges and tree planting to be a minimum distance (1 to 2m) from new and existing PRow where possible.</li> </ul> <p>The above measures, where agreed, will be included in an updated <b>Outline PRow Strategy</b> (APP- 581) which will be submitted to Examination at Deadline 3.</p>
<b>Draft Development Consent Order</b>							
LA-15.11	Wording of Requirement(s)	The wording of Requirement 32 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a PRow Strategy, ensuring that PRowS are managed in a safe and appropriate manner during the Projects' construction and	Agreed	Agreed	Agreed	Not Agreed - under discussion	<p>SCC request that the Public Rights of Way Strategy should be submitted to and approved by the relevant highway authority after consultation with the relevant planning authority.</p> <p>ESC is discussing this with SCC. The Applicants will update the <b>draft DCO</b> (APP-023) at Deadline 3 to reflect any agreement reached.</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		operational phases, is appropriate and adequate.					
LA-15.12	Schedule 4: Footpaths to be Stopped up	The alternative footpaths described in Schedule 4 (footpaths to be stopped up) of the <b>draft DCO</b> (APP-023) are appropriate.	Agreed	Agreed	Not Agreed - under discussion	Not agreed - under discussion	<p>The Councils request the following matters should be addressed by the Applicants:</p> <ul style="list-style-type: none"> <li>• More detailed descriptions of alternative footpath listed in Schedule 4 – Footpaths to be Stopped Up to reflect a standard SCC format; and</li> <li>• Errors in the DCO plans and schedules to be corrected.</li> </ul> <p>The Applicants will consider the above and where considered necessary and appropriate will amend the <b>draft DCO</b> (APP-023) and / or <b>Outline PRow Strategy</b> (APP-581) and submit updated documents at Deadline 3.</p> <p>The Applicants note that the final (approved) PRow Strategy, will include any refinements to temporary or permanent PRow diversions and in sufficient detail to accurately map the new routes onto SCC's definitive map.</p>
Other Matters as Required							



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-15.13	Funding for inspections	The Applicants will provide reasonable funding for SCC (under a Planning Performance Agreement or similar) for the certification of new PRoW routes, inspection of alternative rights of way and of the PRoW when reinstated.	Agreed	Agreed	N/A	Agreed	None
LA-15.14	Code of Construction Practice	The wording of Requirement 22 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to development of a CoCP in consultation with the relevant planning authority is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	The Applicants will update the <b>OCoCP</b> (APP-578) to make reference to the PRoW Strategy.
LA-15.15	Fencing and other means of enclosure	The wording of Requirement 17 provided within the <b>draft DCO</b> (APP-023) (and supporting certified documents) with reference to fencing and other means of	Agreed	Agreed	Agreed	Agreed	The Applicants will ensure that the final PRoW Strategy (secured under Requirement 32 of the <b>draft DCO</b> (APP-023)) includes details of any fencing across existing PRoWs, new PRoW diversions or temporary PRoW diversions for approval.



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		enclosure is appropriate and adequate.					

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### 2.13.3 Socio-Economics

58. The Projects have the potential to impact upon socio-economics. **Chapter 30 Tourism, Recreation and Socio-Economics** of the ES (APP-078) provides an assessment of the significance of these impacts.
59. **Table 32** provides an overview of consultation undertaken with the Councils regarding socio-economics. Further details on the stakeholder engagement process for socio-economics can be found in the **Consultation Report** (APP-029).

**Table 32 Summary of Consultation with the Councils Regarding Socio-Economics**

Date	Contact Type	Topic
<b>Pre-Application</b>		
12th June 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
24 <sup>th</sup> January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
<b>Post-Application</b>		
16 <sup>th</sup> April 2020	Meeting	SoCG Meeting 1
19 <sup>th</sup> June 2020	Written Correspondence	Councils provided comments on the SoCG by e-mail

60. **Table 33** presents the matters agreed or not agreed between the Applicants and the Councils in relation to socio-economics.



Table 33 Socio-Economics

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-16.01	Existing Environment	Sufficient labour market data has been collected to inform the desk-based assessment.	Agreed	Agreed	Agreed	Agreed	The Councils acknowledge that the Applicants have used the best data available to them at the time of writing the impact assessment.
LA-16.02	Existing Environment	The ES adequately characterises the baseline environment in terms of socio-economics for the purposes of EIA (at the time the ES was written).	Agreed	Agreed	Agreed	Agreed	<p>The Councils note that the assessment conclusions are based on imperfect modelling (as socio-economics is not an exact science), but the flexibility to mitigate the impacts is achieved through the Employment and Skills Memorandum of Understanding (MoU) (see <b>section 30.3.3.1 of Chapter 30</b> (APP-078)).</p> <p>The Councils agree with this statement based on the baseline at the time it was assessed but recognise that with Covid-19 the baseline will have changed. The Councils seek the Applicants</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>clarification on how this will be dealt with.</p> <p>All parties acknowledge that the situation with Covid-19 will have unknown implications for the socio-economic baseline. The Employment and Skills MoU between the Applicants and the Councils will provide a flexible mechanism to enable targeted action to address current uncertainties.</p>
LA-16.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Agreed	Agreed	None
LA-16.04	Assessment Methodology	<p>The realistic worst case assumptions set out in <b>Table 30.2</b> of <b>Chapter 30</b> (APP-078) for one project alone, for the following parameters presented in the assessment are appropriate:</p> <ul style="list-style-type: none"> <li>Construction Phase (Onshore): <ul style="list-style-type: none"> <li>size of the employment opportunity;</li> </ul> </li> </ul>	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		<ul style="list-style-type: none"> <li>– duration of construction phase;</li> <li>– residual magnitude of determinants; and</li> <li>– travel to work times.</li> <li>• Construction Phase (Offshore):                             <ul style="list-style-type: none"> <li>– size of the employment opportunity; and</li> <li>– duration of construction phase.</li> </ul> </li> <li>• Operational Phase (Onshore):                             <ul style="list-style-type: none"> <li>– size of employment opportunity; and</li> <li>– duration of operation phase.</li> </ul> </li> <li>• Operational Phase (Offshore):                             <ul style="list-style-type: none"> <li>– location of offshore windfarm.</li> </ul> </li> </ul>					
LA-16.05	Assessment Conclusions	The conclusions of the project alone impact assessment set out in <b>Table 30.98, Chapter 30</b> of the ES (APP-078) are acceptable for the following aspects of the Projects:	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		<ul style="list-style-type: none"> <li>Construction in relation to Impact 1a - onshore construction employment and Impact 1b – offshore construction employment;</li> <li>Operation in relation to Impact 1 – long term employment; and</li> <li>Decommissioning.</li> </ul>					
LA-16.06	Assessment Conclusions	<p>The conclusions of the CIA between the Projects as set out in <b>Table 30.98, Chapter 30</b> (APP-078) are acceptable for the following aspects:</p> <ul style="list-style-type: none"> <li>Cumulative construction impacts with East Anglia ONE North and East Anglia TWO together in relation to Impact 1a – onshore construction employment and Impact 1b – offshore construction employment; and</li> <li>Cumulative operation impacts with East Anglia ONE North and East Anglia TWO together in relation to Impact 1 – long term employment.</li> </ul>	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-16.07	Assessment Conclusions	<p>The conclusions of the CIA with other developments as set out in <b>Table 30.98, Chapter 30</b> (APP-078) are acceptable for the following aspects of the Projects:</p> <ul style="list-style-type: none"> <li>Cumulative construction impacts with other developments in relation to Impact 1a Onshore construction employment and Impact 1b – Offshore construction employment; and</li> <li>Cumulative operation impacts with other developments in relation to Impact 1 – Long terms employment.</li> </ul>	Agreed	Agreed	Not Agreed – under discussion	Not Agreed – under discussion	<p>The Councils request that the Applicants commit to updating their CIA to consider the Sizewell C DCO submission material.</p> <p>The Applicants have submitted a <b>Socio-Economics and Tourism Clarification Note</b> detailing the changes between the submission of the Applications and the publication of Sizewell C DCO application at Deadline 1 (document reference ExA.AS-17.D1.V1).</p> <p>The Councils also request that the Applicants commit to updating their CIA to include East Anglia Three which by virtue of the East Anglia Hub approach is likely to result in the Projects being constructed in a similar timescale or simultaneously.</p> <p>The Applicants are considering their position on the matter.</p> <p>The Applicants have submitted a <b>Socio-Economics and Tourism Clarification Note</b> comparing the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>assumptions used for Sizewell C contained within the Applications with the now published Sizewell C material at Deadline 1 (document reference ExA.AS-17.D1.V1). However, the CIA presented by the Applicants assumes that there is potential for significant impacts from Sizewell C, therefore the Applicants consider there is unlikely to be a change to the conclusions.</p> <p>The Councils also request that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The Applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17. See paragraph 13 of this SoCG for further information on the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Councils' and Applicants' position on the CIA.
LA-16.08	Mitigation	The proposed enhancements, mitigation and monitoring set out within <b>Section 30.3.3</b> and <b>Section 30.3.4</b> of the ES (APP-078) covering skills and training enhancements and supply chain plan are appropriate and sufficient for the purposes of the Application.	Agreed	Agreed	Agreed	Agreed	None
<b>Draft Development Consent Order (DCO)</b>							
LA-16.09	N/A	N/A	N/A	N/A	N/A	N/A	None
<b>Other Matters as Required</b>							
LA-16.10	Employment and Skills MoU	The Applicants have entered into an Employment and Skills MoU with the Councils which establishes a commitment for all parties to develop a close working relationship and intention to work in partnership to maximise the education, skills and economic benefits of the	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Projects in the communities most closely associated.  The Employment and Skills MoU is an appropriate mechanism to secure and deliver this commitment.					
LA-16.11	East Anglia Hub	There is a positive economic development aspect as a result of the East Anglia Hub approach, through maximising economies of scale through the procurement process. This in turn represents a long term commitment to the area by the Applicants.	Agreed	Agreed	Agreed	Agreed	None



### 3 Signatures

61. The above Statement of Common Ground is agreed between East Anglia TWO Limited, East Anglia ONE North Limited, East Suffolk Council and Suffolk County Council on the day specified below.

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Suffolk Council**

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **Suffolk County Council**

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Anglia TWO Limited**



Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Anglia ONE North Limited**

DRAFT