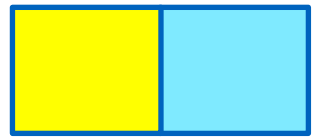




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East Anglia ONE North and East Anglia TWO Offshore Windfarms

Statement of Common Ground

East Suffolk Council and Suffolk
County Council

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



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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
EMF	Electro-Magnetic Field
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
OLEMS	Outline Landscape and Ecological Management Strategy
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 Impact Assessment
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 23rd 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 and not agreed 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**) (Archaeology and Cultural Heritage – SCC, Setting of Heritage Assets - ESC);



- Noise and Vibration (**Table 18** and **Table 19**) (ESC);
 - Traffic and Transport (**Table 21**) (SCC);
 - Human Health (**Table 23**) (ESC and SCC);
 - Offshore Seascape, Landscape and Visual Impact Assessment (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**) (SCC).
6. This SoCG submitted at Deadline 8 supersedes the SoCG submitted at Deadline 1 (REP1-072) and Deadline 7 (REP7-056) and presents updates to all topic areas following further engagement between the Applicants and the Councils
7. 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.
8. The matters considered within this SoCG apply only within the context of the Councils’ statutory remit. Matters that remain not agreed despite extensive discussion between the Applicants and the Councils to reach agreement are accompanied by some supplementary commentary in the notes column of the SoCG tables to provide further context and justification.

1.2 The Development

9. 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.



10. 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.
11. 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 and Not Agreed Matters

Table 1 provides a summary of the matters agreed and not agreed between the Applicants and the Councils for each of the relevant SoCG topic areas.

Table 1 Summary of Agreed and Not Agreed

Topic	Summary
Ground Conditions and Contamination	All matters relating to Existing Environment, Assessment Methodology and Mitigation have been agreed. One matter relating to the Assessment Conclusions (regarding the CIA, see paragraph 13) remain not agreed. All matters pertaining to the DCO are agreed.



Topic	Summary
Land Use	<p>All matters relating to Existing Environment and Assessment Methodology have been agreed. Certain matters relating to the Assessment Conclusions and Mitigation remain not agreed.</p> <p>Matters pertaining to the DCO are agreed.</p>
Onshore Ecology	<p>All matters relating to Existing Environment and Assessment Methodology have been agreed. Certain matters relating to the Assessment Conclusions and Mitigation remain not agreed.</p> <p>All matters pertaining to the DCO are agreed.</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 have been agreed. One matter relating to the Assessment Conclusions (regarding the CIA, see paragraph 13) remain not agreed.</p> <p>All matters pertaining to the DCO are agreed.</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 and Assessment Conclusions have been agreed. Certain matters relating to the Assessment Methodology and Mitigation remain not agreed.</p> <p>All matters pertaining to the DCO and other matters (monitoring and onshore preparation works) are agreed.</p>
Water Resources and Flood Risk	<p>Certain matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.</p> <p>Matters pertaining to the DCO are not fully agreed, whilst other matters (offsite construction works, consents and permits and surface water drainage) are agreed.</p>
Archaeology and Cultural Heritage	<p>Onshore Archaeology</p> <p>Matters relating to the Existing Environment remain not agreed, although the scope of works to reach agreement have been approved.</p> <p>All matters relating to the Assessment Methodology, Assessment Conclusions and Mitigation have been agreed.</p> <p>All matters pertaining to the DCO and other matters (relationship between onshore preparation works and pre-commencement archaeological investigation) are agreed.</p>



Topic	Summary
	<p>Setting of Heritage Assets</p> <p>Matters relating to the Existing Environment and Assessment Methodology are agreed. Certain matters relating to the Assessment Conclusions and Mitigation remain not agreed.</p> <p>Matters pertaining to the DCO are not considered relevant to this topic, but other matters (regarding landscape planting) have been agreed.</p>
Noise and Vibration	<p>Operation Phase</p> <p>Certain matters relating to the Existing Environment, Assessment Methodology and Assessment Conclusions remain not agreed.</p> <p>All matters pertaining to Mitigation and the DCO are agreed.</p> <p>Certain matters relating to other matters remain not agreed.</p> <p>Construction Phase</p> <p>Certain matters relating to the Assessment Methodology and Assessment Conclusions remain not agreed.</p> <p>All matters pertaining to the Existing Environment, Mitigation and the DCO are agreed.</p> <p>All other matters have been agreed.</p>
Traffic and Transport	<p>All matters relating to Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation are agreed.</p> <p>All matters pertaining to the DCO, Outline Construction Traffic Management Plan (Outline CTMP) (document reference 8.9), Outline Travel Plan (document reference 8.11) and Outline Access Management Plan (Outline AMP) (document reference 8.10) are agreed.</p> <p>All other matters have been agreed.</p>
Human Health	<p>Certain matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.</p> <p>All matters pertaining to the DCO have been agreed.</p>
Offshore Seascape, Landscape and Visual Amenity	<p>All matters relating to the Existing Environment have been agreed.</p> <p>Certain matters relating to the Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.</p> <p>All matters pertaining to the DCO are agreed.</p>



Topic	Summary
Landscape and Visual	<p>Certain matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.</p> <p>All matters pertaining to the DCO are agreed, whilst certain other matters remain not agreed.</p>
Tourism	<p>Certain matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.</p> <p>Matters pertaining to the DCO are not considered relevant to this topic, but other matters (regarding a tourism fund) have been agreed.</p>
Recreation (Public Rights of Way (PRoW))	<p>Certain matters relating to the Existing Environment, Assessment Methodology and Assessment Conclusions remain not agreed.</p> <p>All matters pertaining to Mitigation and other matters (regarding funding for inspections, the Code of Construction Practice (CoCP) and fencing and other means of enclosure) are agreed.</p> <p>One matter pertaining to the DCO remains not agreed.</p>
Socio-Economics	<p>All matters relating to Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation have been agreed.</p> <p>Matters pertaining to the DCO are not considered relevant to this topic, but other matters (regarding an Employment and Skills Memorandum of Understanding (MoU) and the East Anglia Hub) have been agreed.</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 Applicants' 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).
- Since commencement of the Examination both Five Estuaries and North Falls have provided updated confirmation that the projects are not intending a future grid connection at Friston. National Grid ventures have not advanced the Nautilus or Eurolink projects to a stage where project detail is available. The Applicants have, to the extent possible on the basis of information currently available, provided a cumulative assessment of all foreseeable developments. This is reflected in updated clarifications provided during examination. This has reflected changes in Sizewell C application and the hypothetical extension of proposed National Grid substation north of Friston.



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
Pre-Application		
26 th April 2018	Meeting	Method statement, Projects update and approach to the assessment (methodology, impacts, data collection, etc.).
29 th January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the Preliminary Environmental Information Report (PEIR).
Post-Application		
18 th March 2020	Meeting	SoCG Meeting 1
5 th October 2020	Meeting	SoCG workshop
12 th February 2021	Meeting	SoCG Meeting 2



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
Environmental Impact Assessment							
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 draft DCO (document updated at Deadline 8, document reference 3.1), in accordance with section 7 of the Outline CoCP (document reference 8.1). 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	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		contamination based on the desktop study to date.					
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 Table 18.1, Chapter 18 Ground Conditions and Contamination (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	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		are consistent with the agreed assessment methodologies.					
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	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>



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 Council's and Applicant's position on the CIA.
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 (Outline CoCP) (document reference 8.1) for the management (including reuse) of excavated materials on site where possible during the construction phase.	Agreed	Agreed	Agreed	Agreed	None
Draft Development Consent Order							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-00.12	Wording of Requirement(s)	The wording of Requirement 22 provided within the draft DCO (document reference 3.1) (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	Agreed	Agreed	None
LA-00.13	Wording of Requirement(s)	The wording of Requirement 18 provided within the draft DCO (document reference 3.1) with reference to 'a written scheme to mitigate the potential for release of contaminants' which includes an investigation and assessment report and the implementation of mitigation measures, is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	None
Other Matters as Required							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
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 th March 2020	Meeting	SoCG Meeting 1
24 th July 2020	Meeting	SoCG Meeting 2
12 th February 2021	Meeting	SoCG Meeting 3

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
Environmental Impact Assessment							
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 Table 21.2 Chapter 21 Land Use (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	Agreed	Agreed	The Councils note the Applicants' reasoning for identifying the significance of the impact on permanent and temporary changes to land use in relation to the total available farmed resource in Suffolk. However, it is difficult to understand how any development, if impact significance is assessed on this scale, would result in anything greater than a minor adverse impact. This would appear contrary to National Policy Statement (NPS) EN-1 which states that "Applicants should seek to minimise impacts on the best and most versatile agricultural land".
LA-01.07	Assessment Conclusions	The assessment of cumulative impacts between East Anglia	Agreed	Agreed	Agreed	Agreed	The Councils note the Applicants' reasoning for identifying the significance of the impact on permanent and temporary changes to land use



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		TWO and East Anglia ONE North is appropriate.					in relation to the total available farmed resource in Suffolk. However, it is difficult to understand how any development, if impact significance is assessed on this scale, would result in anything greater than a minor adverse impact. This would appear contrary to National Policy Statement (NPS) EN-1 which states that "Applicants should seek to minimise impacts on the best and most versatile agricultural land".
LA-01.08	Assessment Conclusions	The assessment of cumulative impacts with future projects is 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 Council's and Applicants' position on the CIA.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-01.09	Assessment Conclusions	The Projects minimise impacts to the best and most versatile land.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils accept that the Applicants have minimised impacts to the best and most versatile land as far as possible at this stage through reductions to the footprint of the Projects' onshore substations committed to within the Project Update Note (REP2-007) and the Substations Design Principles Statement (REP4-029). The Councils anticipate that further consideration to minimising impacts to land will be made post-consent.</p> <p>The Councils consider that National Grid has not undertaken the same design refinement at this stage in relation to the National Grid substation. This remains the main reason for not reaching agreement on this statement.</p> <p>The Councils request that a clear commitment is provided within the Substations Design Principles Statement (REP4-029) 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 refinement, consultation and approval, the DCO authorises the Projects within specified maximum parameters (secured by</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							Requirement 12 of the draft DCO (document reference 3.1)) and it is not appropriate for all such parameters to be subject to uncertainty associated with the requirement for further approvals.
LA-01.10	Mitigation	The embedded mitigation set out within Section 21.3.3 and Section 21.3.4 of the ES (APP-069) is appropriate and sufficient.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils acknowledge the pre-consent work undertaken by the Applicants to reduce the footprint of the onshore substations.</p> <p>The Councils do not agree that National Grid have minimised or provided sufficient commitment to minimise, the footprints of the National Grid infrastructure to the maximum reasonable extent. The Councils request that a clear commitment is provided within the Substations Design Principles Statement (REP4-029) 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 refinement, consultation and approval, the DCO authorises the Projects within specified maximum parameters and it is not appropriate for all such parameters to be</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>subject to uncertainty associated with the requirement for further approvals.</p> <p>The Councils acknowledge the Applicants' commitment to the simultaneous installation of ducting for both Projects should both Projects be consented and built sequentially.</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	None
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	None
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 draft DCO (document reference 3.1) (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	Agreed	Agreed	None
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 Requirement 21(2) and Requirement 26 of the draft DCO (document reference 3.1).	Agreed	Agreed	Agreed	Agreed	None
Other Matters as Required							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
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
Pre-Application		
20 th February 2018	Meeting	Assessment study area, outline ecological survey methodology and requirements
27 th April 2018	Meeting	Method statement, Projects update and approach to the assessment (methodology, impacts, data collection, etc.)
5 th November 2018	Meeting	Early presentation of assessment, impacts and mitigation in advance of publication of the PEIR
25 th January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
9 th May 2019	Meeting	Updates on the pre-application ecological survey requirements
Post-Application		
17 th March 2020	Meeting	SoCG Meeting 1
4 th August 2020	Meeting	SoCG Meeting 2
7 th October 2020	Meeting	SoCG workshop
17 th March 2021	Meeting	SoCG Meeting 3

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
Environmental Impact Assessment							
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 Chapter 22 Onshore Ecology (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 Table 22.3, Chapter 22 Onshore Ecology (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 Table 22.3, Chapter 22 Onshore Ecology (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"> • Arable habitats; • Grassland habitats; • Coastal habitats; 	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"> Watercourses and ponds; Great crested newts; and Reptiles. 					
LA-02.12	Assessment Conclusions	The ES adequately assesses the impacts, both magnitude and temporal, on bats during construction.	Agreed	Agreed	Agreed	Agreed	<p>The Councils recognise that the effective and robust implementation of the adaptive management scheme as set out in the Outline Landscape and Ecological Management Strategy (OLEMS) (an updated version has been submitted at Deadline 8, document reference 8.7) will reduce the risk of failure of planting at Work Nos 19, 24, 29 and 33 and may help achieve the growth rates assumed by the Applicants in those areas.</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 that will:</p> <ul style="list-style-type: none"> Be installed immediately following the removal of selected hedgerow sections; Only be removed during construction activities associated with crossing the



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>respective hedgerow (i.e. excavating, cable laying, use of haul road, backfilling);</p> <ul style="list-style-type: none"> • Be retained in situ outside of the agreed working hours where the crossing of a hedgerow spans more than one working day; and • Be of similar height to the existing, retained hedgerow. <p>Such measures are captured within the updated OLEMS (document reference 8.7).</p>
LA-02.13	Assessment Conclusions	The period selected for hedgerows to be restored to their target condition is appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils consider the Applicants growth rates are optimistic.</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 draft DCO (document reference 3.1) which will accord with the OLEMS (document reference 8.7).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-02.14	Assessment Conclusions	The assessment of impacts on woodlands and trees is appropriate and sufficient.	Agreed	Agreed	Agreed	Agreed	<p>The Councils recognise that the effective and robust implementation of the adaptive management scheme as set out in the OLEMS (document reference 8.7) will reduce the risk of failure of planting at Work Nos 19, 24 and 33 and may help achieve the growth rates assumed by the Applicants.</p> <p>Details of management measures will be set out within the Landscape Management Plan secured under Requirement 14 of the draft DCO (document reference 3.1) which will accord with the OLEMS (document reference 8.7).</p>
LA-02.15	Assessment Conclusions	The assessment of impacts on designated sites from Nitrogen Oxides (NO _x) emissions is appropriate and sufficient.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Applicants submitted an Air Quality Clarification Note (REP1-040) at Deadline 1. A Deadline 3 Air Quality Clarification Note (REP3-061) also included a quantitative assessment of the impact of Non Road Mobile Machinery (NRMM) on ecological receptors.</p> <p>To ensure consistency and avoid duplication, the Councils now defer to Natural England on this matter.</p> <p>The Applicants have submitted a Deadline 6 Onshore Ecology Clarification Note (REP6-</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							025) in response to Natural England's Deadline 4 submission (REP4-092). The Councils provided a response at Deadline 7 (REP7-063) to the Applicants Deadline 6 (REP6-025) submission.
LA-02.16	Assessment Conclusions	The assessment of impacts on designated sites from acid deposition is appropriate and sufficient.	Agreed	Agreed	Not Agreed	Not Agreed	The Applicants submitted an Air Quality Clarification Note (REP1-040) at Deadline 1. A Deadline 3 Air Quality Clarification Note (REP3-061) also included a quantitative assessment of the impact of NRMM on ecological receptors. To ensure consistency and avoid duplication, the Councils now defer to Natural England on this matter. The Applicants have submitted a Deadline 6 Onshore Ecology Clarification Note (REP6-025) in response to Natural England's Deadline 4 submission (REP4-092). The Councils provided a response at Deadline 7 (REP7-063) to the Applicants Deadline 6 (REP6-025) submission.
LA-02.17	Assessment Conclusions	The assessment of construction noise effects on	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		ecological receptors is appropriate and sufficient.					
LA-02.18	Assessment Conclusions	The assessment of operational noise effects on ecological receptors is appropriate and sufficient.	Agreed	Agreed	Not Agreed	Not Agreed	The Applicants undertook an assessment of the potential for impacts on sensitive ecological receptors (e.g. bats, birds) arising from operational noise levels at the onshore substations. This was presented within the Onshore Ecology Clarification Note (REP4-005) submitted at Deadline 4. The Councils responded at Deadline 5 (REP5-048) with the Applicants (REP6-026) responding at Deadline 6 (REP6-026). The Councils provided further comments at Deadline 6 (REP6-075) and Deadline 7 (REP7-063).
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	Agreed	Agreed	Not Agreed	Not Agreed	Please refer to the notes at statements LA-02.13, LA-02.15, LA-02.16 and LA-02.18.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		for the Projects are appropriate.					
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	Not Agreed	Please refer to the notes at statements LA-02.13, LA-02.15, LA-02.16 and LA-02.18.
LA-02.22	Assessment Conclusions	The assessment of cumulative impacts with future projects is 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-02.23	Mitigation	The mitigation presented within the OLEMS (document reference 8.7), and stated	Agreed	Agreed	Not agreed	Not agreed	The Applicants' position is that Biodiversity Net Gain is not applicable to Nationally Significant Infrastructure Projects (NSIPs) and marine



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		within the assessment, represents an ecological enhancement when compared with the existing ecological baseline at the substations site.					<p>developments. This is confirmed in the UK Government's response to DEFRA consultation on Net Gain*. The Applicants have submitted an Ecological Enhancement Clarification Note Addendum at Deadline 8 (document reference ExA.AS-16.D8.V1).</p> <p>The Councils have requested further information regarding the ecological enhancements and how they have been calculated to demonstrate a genuine gain. The Councils will review any additional information provided by the Applicants at Deadline 8 and respond at Deadline 9.</p> <p>Additionally, the Councils noted a potential calculation error in the length of newly planted hedgerow at the onshore substation location (REP2-029). The Applicants will correct this error in an addendum to REP1-035 to be submitted at Deadline 8.</p>
LA-02.24	Mitigation	The embedded mitigation and monitoring for bats, set out within section 22.3.3 and section 22.3.4 of the ES	Agreed	Agreed	Agreed	Agreed	The Councils recognise that the effective and robust implementation of the adaptive management scheme as set out in the OLEMS (document reference 8.7) will reduce the risk of

* 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
		(APP-070), is appropriate and sufficient.					<p>failure of planting at Work Nos 19, 24 and 33 and may help achieve the growth rates assumed by the Applicants.</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 that will:</p> <ul style="list-style-type: none"> • Be installed immediately following the removal of selected hedgerow sections; • Only be removed during construction activities associated with crossing the respective hedgerow (i.e. excavating, cable laying, use of haul road, backfilling); • Be retained in situ outside of the agreed working hours where the crossing of a hedgerow spans more than one working day; and • Be of similar height to the existing, retained hedgerow



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Such measures are captured within the updated OLEMS (document reference 8.7).
LA-02.25	Mitigation	The embedded mitigation and monitoring for hedgerows, set out within section 22.3.3 and section 22.3.4 of the ES (APP-070) is appropriate and sufficient.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils consider the Applicants growth rates are optimistic.</p> <p>The Councils however recognise that the effective and robust implementation of the adaptive management scheme as set out in the OLEMS (document reference 8.7) will reduce the risk of failure of planting of Work Nos 19, 24 and 33 and may help achieve the growth rates assumed by the Applicants. The Councils note that the dynamic landscape management measures do not however apply to hedgerows outside Work Nos 19, 24 and 33.</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 draft DCO (document reference 3.1) which will accord with the OLEMS (document reference 8.7).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-02.26	Mitigation	The embedded mitigation and monitoring for woodlands and trees, set out within section 22.3.3 and section 22.3.4 of the ES (APP-070) is appropriate and sufficient.	Agreed	Agreed	Agreed	Agreed	<p>The Councils recognise that the effective and robust implementation of the adaptive management scheme as set out in the OLEMS (document reference 8.7) will reduce the risk of failure of planting in Work Nos. 19, 24, 29 and 33 and may help achieve the growth rates assumed by the Applicants.</p> <p>The Applicants note a management period of 10 years will apply to woodland planting within Work Nos. 19, 24, 29 and 33 and the Applicants commit to replace failed trees and shrubs within Work No. 19, 24, 29 and No. 33 on a one-for-one basis within the first 10 years (or as otherwise agreed with the relevant planning authority in accordance with the adaptive management scheme).</p>
LA-02.27	Mitigation	The embedded mitigation and monitoring for: <ul style="list-style-type: none"> • Arable habitats; • Grassland habitats; • Coastal habitats; • Watercourses and ponds; 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
		<ul style="list-style-type: none"> Great crested newts. as set out in the ES (APP-070) is appropriate and sufficient. 					
Draft Development Consent Order							
LA-02.28	Wording of Requirement(s)	The wording of Requirement 14 provided within the draft DCO (document reference 3.1) (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	Agreed	Agreed	<p>The Councils requested clarification regarding the long-term management of Work No.24 and the utilisation of dynamic landscape management measures.</p> <p>The Applicants are proposing additional dynamic landscape management measures at Works Nos. 19, 24, 29 and 33 which will assist in promoting growth of landscape planting. These measures are set out within section 4.2 of the current OLEMS (document reference 8.7). A management period of 10 years will apply to woodland planting within Work Nos. 19, 24, 29 and 33 and the Applicants commit to replace failed trees and shrubs within Work Nos 19, 24, 29 and 33 on a one-for-one basis within the first 10 years (or as otherwise agreed with the relevant planning authority in</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							accordance with the adaptive management scheme).
LA-02.29	Wording of Requirement(s)	The wording of Requirement 21 provided within the draft DCO (document reference 3.1) (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	Agreed	Agreed	None
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 draft DCO (document reference 3.1)) is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-02.31	Wording of Requirement(s)	The onshore preparation works in relation to their	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 onshore ecology, are subject to an appropriate and proportionate level of control via Requirement 21 of the draft DCO (document reference 3.1).					
Other Matters as Required							
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	None



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
Pre-Application		
20 th February 2018	Meeting	Assessment study area, outline ecological survey methodology and requirements
27 th April 2018	Meeting	Method statement, Projects update and approach to the assessment (methodology, impacts, data collection, etc.)
5 th November 2018	Meeting	Early presentation of assessment, impacts and mitigation in advance of publication of the PEIR
25 th January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
9 th May 2019	Meeting	Updates on the pre-application ecological survey requirements
Post-Application		
17 th March 2020	Meeting	SoCG Meeting 1
4 th August 2020	Meeting	SoCG Meeting 2
7 th October 2020	Meeting	SoCG workshop
17 th March 2021	Meeting	SoCG Meeting 3

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
Environmental Impact Assessment							
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 Table 23.3, Chapter 23 Onshore Ornithology (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 Table 23.3, Chapter 23 Onshore Ornithology (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	Agreed	Agreed	None
LA-03.09	Assessment Conclusions	The assessment of cumulative impacts between the East Anglia	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		ONE North project and East Anglia TWO project is appropriate.					
LA-03.10	Assessment Conclusions	The assessment of cumulative impacts with future projects is 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-03.11	Mitigation	The embedded mitigation and monitoring set out within section 23.3.3 and section 23.3.4 of the ES (APP-071) is appropriate and sufficient.	Agreed	Agreed	Agreed	Agreed	None
Draft Development Consent Order							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-03.12	Wording of Requirement(s)	The wording of Requirement 21 provided within the draft DCO (document reference 3.1) (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	Agreed	Agreed	None
LA-03.13	Wording of Requirement(s)	The scope of the pre-construction surveys included within OLEMS (document reference 8.7) (referenced in Requirement 21 of the draft DCO (document reference 3.1)) 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 draft DCO (document reference 3.1).	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 draft DCO (document reference 3.1).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
Other Matters as Required							
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	None



2.5 Air Quality

25. 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.
26. **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
Pre-Application		
26 th April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
29 th January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
9 th May 2019	Meeting	Refinement and agreement of assessment methodology
Post-Application		
18 th March 2020	Meeting	SoCG Meeting 1
27 th July 2020	Meeting	SoCG Meeting 2
7 th October 2020	Meeting	SoCG workshop
11 th February 2021	Meeting	SoCG Meeting 3
23 rd March 2021	Meeting	SoCG Meeting 4

27. **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
Environmental Impact Assessment							
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	Agreed	Agreed	The Applicants submitted an Air Quality Clarification Note (REP1-040) at Deadline 1. A Deadline 3 Air Quality Clarification Note (REP3-061) also included a quantitative assessment of the impact of



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.					Non-Road Mobile Machinery (NRMM) on ecological receptors.
LA-04.04	Assessment Methodology	The assessment has been undertaken with consideration of the appropriate relevant guidance.	Agreed	Agreed	Agreed	Agreed	None
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	Not Agreed	<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 Chapter 26 of the ES (APP-074).</p> <p>The Applicants submitted an Air Quality Clarification Note (REP1-040) to Examination at Deadline 1 which addresses the potential for air quality impacts to arise as a result of these works.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>After reviewing REP1-040 the Councils agree that there is no issue regarding Work No. 35. However, the Applicants should provide further details regarding potential air quality impacts arising from traffic flow changes that might occur as a result in Work Nos. 36 and 37. The Applicants have provided clarification in <i>Applicants' Comments on East Suffolk Council's Deadline 5 Submissions</i> (REP6-026).</p> <p>The Councils consider that the <i>Applicants' Comments on East Suffolk Council's Deadline 5 Submissions</i> (REP6-026) only addresses potential impacts associated with traffic lights on the A12/A1094 junction (Works No. 36). Further information is still sought on Works No.37 to confirm the potential air quality implications of traffic disruption due to bridge strengthening works.</p>
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	Discontinued	Discontinued	See LA.04.05.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-04.07	Assessment Methodology	The decision to scope out project alone operation phase air quality impacts is reasonable and appropriate.	Agreed	Agreed	Agreed	Agreed	None
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	Agreed	Agreed	The Applicants submitted an Air Quality Clarification Note (REP1-040) at Deadline 1. A Deadline 3 Air Quality Clarification



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Note (REP3-061) also included a quantitative assessment of the impact of NRMM on ecological receptors.
LA-04.12	Assessment Methodology	The air quality assessment based on the worst case traffic flows as presented within Chapter 26 Traffic and Transport 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 Air Quality Clarification Note (REP1-040) 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 Chapter 26 Traffic and Transport of the ES (APP-074), and therefore represents an assessment of the worst case air quality impacts.	Agreed	Agreed	Agreed	Agreed	A discrepancy in the worst case traffic flows was resolved in the Air Quality Clarification Note (REP1-040) submitted to Examination at Deadline 1.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
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	<p>A range of mitigation measures available for the Projects has been proposed within Chapter 19 of the ES – Air Quality (APP-067).</p> <p>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 draft DCO (document reference 3.1). At this stage, the specific mitigation to be implemented has not been specified or agreed.</p>
LA-04.15	Assessment Methodology	The approach to assessing cumulative air quality impacts with the proposed SZC project is appropriate.	Agreed	Agreed	Agreed	Agreed	<p>The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009).</p> <p>The Applicants submitted a Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) Clarification Note (REP2-009) at Deadline 1. An updated version of this clarification note was submitted at Deadline 6 (REP6-043).</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The Councils have carried out their own assessment which is under discussion between the Applicants of the projects and the Applicant for SZC DCO.
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 _x concentrations at ecological receptors are appropriate.	Agreed	Agreed	Agreed	Agreed	<p>The Applicants have submitted an Air Quality Clarification Note (REP1-040) to Examination at Deadline 1. A Deadline 3 Air Quality Clarification Note (REP3-061) also included a quantitative assessment of the impact of NRMM on ecological receptors.</p> <p>The Councils agree that the NO_x results presented at habitats are appropriate. The conclusions of NO_x significance upon habitats remains not agreed between the Councils and the Applicants, as per the notes at statement LA-02.15.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-04.18	Assessment Conclusions	The results of NO ₂ , PM ₁₀ and PM _{2.5} 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	<p>The Applicants confirm that the Port Construction Traffic Management and Travel Plan (secured under Requirement 36 of the <i>draft DCO</i> (document reference 3.1)) will incorporate an assessment of potential air quality impacts associated with the Projects contribution to port traffic during construction.</p> <p>The Applicants submitted an <i>Outline Port Construction Traffic Management and Travel Plan</i> to Examination at Deadline 3 (REP3-047), which was updated at Deadline 6 (REP6-047).</p>
LA-04.20	Assessment Conclusions	The assessment of impacts for construction and operation for the Projects alone and the Projects together (cumulatively) presented are	Agreed	Agreed	Agreed	Agreed	<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</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		consistent with the agreed assessment methodologies.					<p>are considered not to affect the conclusions are presented below:</p> <ol style="list-style-type: none"> 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. 2. Environmental Transport Meeting Group 29/1/19. ESC raised concerns 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



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>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 have been assessed by the Applicants in the Air Quality Clarification Note submitted at Deadline 1 (REP1-040). 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 will not alter conclusions already reached in this assessment.</p> <p>The Applicants have submitted an Air Quality Clarification Note (REP1-040) at Deadline 1. A Deadline 3 Air Quality Clarification Note (REP3-061) also included a quantitative assessment of the impact of NRMM and haul road heavy</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>goods vehicle (HGV) movements on ecological receptors.</p> <p>The updated Outline CoCP (document reference 8.1) contains a commitment that the final CoCP will identify specific areas of sensitivity within the onshore development area where specific mitigation measures will be implemented.</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	Discontinued	Discontinued	See LA-04.24.
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	Agreed	Agreed	The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009).



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Councils consider that the assessment methodology is acceptable. However, there is not agreement with the Applicants' conclusions. The emission sensitivity test 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 NO₂ 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 Appendix 19.4 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>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Following review of this information and recent air quality monitoring data, the Councils agreed that there is no significant risk of cumulative air quality impacts as a result of East Anglia ONE North and East Anglia TWO.
LA-04.24	Assessment Conclusions	The assessment conclusions of cumulative impacts between the Projects and the proposed SZC development are appropriate.	Agreed	Agreed	Agreed	Agreed	<p>The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009).</p> <p>The Councils understand that an updated Outline CTMP will be submitted at Deadline 8 and will provide acceptable clarification of monitoring arrangements for HGV emissions standards, and the controls that will be applied to vehicles not complying with Euro VI standards.</p>
LA-04.25	Assessment Conclusions	The assessment conclusions of cumulative impacts between future projects is appropriate.	Agreed	Agreed	Agreed	Agreed	See LA-04.24.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-04.26	Mitigation	The embedded mitigation set out within Section 19.3.4 and Section 19.3.5 of the ES is appropriate, sufficient and commensurate with the scale of the project's impacts.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009).</p> <p>The Councils understand that an updated Outline CTMP will be submitted at Deadline 8 and will provide acceptable clarification of monitoring arrangements for HGV emissions standards, and the controls that will be applied to vehicles not complying with Euro VI standards.</p> <p>The Councils consider there are currently insufficient mitigation measures regarding potential impact of NRMM at designated habitat sites.</p>
LA-04.27	Mitigation	The embedded mitigation, including production of an Air Quality Management Plan (AQMP), is appropriate to control wind-blown dust.	Agreed	Agreed	Agreed	Agreed	<p>An updated Outline CoCP has been submitted to the Examinations at Deadline 8 (document reference 8.7) which contains a commitment that the final CoCP will identify specific areas of sensitivity within the onshore development area where specific mitigation measures will be implemented.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The Councils consider the latest Outline CoCP contains a satisfactory commitment to consider how coastal areas wind speeds affect construction dust.
LA-04.28	Mitigation	The mitigation measures proposed with regard to stockpile management and the control of dust are appropriate and sufficient.	Agreed	Agreed	Agreed	Agreed	<p>An updated Outline CoCP has been submitted to the Examinations at Deadline 8 (document reference 8.7) which contains a commitment that the final CoCP will identify specific areas of sensitivity within the onshore development area where specific mitigation measures will be implemented.</p> <p>The relevant planning authority must approve the final CoCP. The Councils consider the latest code of construction practice contains a satisfactory commitment to consider how coastal areas wind speeds affect construction dust.</p>
Draft Development Consent Order							
LA-04.29	Wording of Requirement(s)	The wording of Requirement 22 provided within the draft DCO (document reference 3.1) (and supporting certified	Agreed	Agreed	Agreed	Agreed	The Councils agree with the principle and intention of the CoCP secured by Requirement 22 but query how the Applicants' Air Quality Management Plan



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		documents) with reference to development of a CoCP for the mitigation and monitoring of potential impacts on air quality (including dust) is appropriate and adequate.					<p>secured under draft DCO (document reference 3.1) Requirement 22 relates to the Construction Traffic Management Plan (CTMP) secured under draft DCO (document reference 3.1) Requirement 28.</p> <p>The Councils would like the air quality management plan section within the Outline CoCP (document reference 8.1) pre-consent to include the following:</p> <ol style="list-style-type: none"> 1. Agreements to control Euro standard vehicles. 2. 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. 3. Facilitation of dust monitoring in response to complaints regarding dust nuisance received by Councils. 4. Additional mitigation measures which may be required in the light of the Air Quality Clarification Note findings.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The updated Outline CoCP (document reference 8.7) contains commitments to the above four requests from the Council.
LA-04.30	Wording of Requirement(s)	The wording of Requirement 36 provided within the draft DCO (document reference 3.1) (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	Agreed	Agreed	<p>Agreed subject to insertion of wording into the Port Construction Traffic Management and Travel Plan paragraphs 21 and 26: <i>"Should the assessments identify any significant impacts on human or ecological receptors, appropriate mitigation should be specified and agreed in writing with the relevant local planning authority"</i>.</p> <p>The Applicants note the above request by the Councils and will submit at updated Port Construction Traffic Management and Travel Plan at Deadline 8.</p>
Other Matters as Required							
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	Agreed	Agreed	Agreed	Agreed	The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009).



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		the Outline CoCP (document reference 8.1), is appropriate and sufficient.					<p>The Applicants note that the principles for reporting HGV movements are set out within Section 4.2 of the Outline CTMP (REP6-010). The Applicants confirm that the Outline CTMP (REP6-101) and Outline Travel Plan (REP6-014) include controls and monitoring to limit traffic flows to that assessed within Chapter 26 Traffic and Transport (APP-074), and these outline plans provide detail on how such controls will be implemented in practice.</p> <p>The Councils understand that an updated Outline CTMP will be submitted at Deadline 8 and will provide acceptable clarification of monitoring arrangements for HGV emissions standards, and the controls that will be applied to vehicles not complying with Euro VI standards.</p>
LA-04.34	Onshore preparation works	The approach to assessing onshore preparation works upon local air quality or dust nuisance is appropriate. Onshore preparation works are defined within the draft DCO (document reference	Agreed	Agreed	Agreed	Agreed	<p>The Applicants confirm that vehicle trips associated with onshore preparation works are less than vehicle trips generated during construction, as outlined in Air Quality Appendix 19.3 (APP-492). As a result, the Councils agree that no further assessment of vehicle emissions is required.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		3.1) as '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 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'					<p>The Councils consider the activities which have the potential for substantial dust nuisance include:</p> <ol style="list-style-type: none"> 1. Site clearance 2. Demolition work 3. Remedial work for contaminated land or adverse ground conditions 4. Highway alterations <p>The Councils advised that proposed mitigation for dust nuisance should be submitted to the Councils in advance of the 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 draft DCO (document reference 3.1) ensures appropriate controls are in place when undertaking highway alterations (Requirement 16), archaeological investigations (Requirement 19) and creation of site accesses (Article 13).</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>However, the Applicants note that matters to be considered within an Onshore Preparation Works Management Plan have been provided within the updated Outline CoCP submitted at Deadline 6 (REP6-003). Development of a final Onshore Preparation Works Management Plan has been secured through the updated draft DCO (document reference 3.1).</p> <p>The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009).</p>



2.6 Water Resources and Flood Risk

28. 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.
29. **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
Pre-Application		
27 th April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
7 th November 2018	Meeting	High-level presentation of assessment, impacts and mitigation in advance of publication of the PEIR
2 nd May 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR and agreements on methodology
Post-Application		
24 th March 2020	Meeting	SoCG Meeting 1
26 th June 2020	Meeting	SoCG Meeting 2
25 th September 2020	Written Correspondence	Applicants issued updated SoCG to Councils for comment
9 th October 2020	Written Correspondence	Councils provided comments on SoCG
9 th October 2020	Written Correspondence	Comments on Outline Operational Drainage Management Plan
5 th March 2021	Meeting	Discussion regarding surface water drainage matters
16 th March 2021	Meeting	SoCG Meeting 3



30. **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
Environmental Impact Assessment							
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 Chapter 20 Water Resources and Flood Risk (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 submitting this SoCG.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Friston Surface Water Management Plan[†] 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 new</p>

[†] 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
							<p>baseline has been reviewed in detail and updated, where appropriate.</p> <p>The Applicants have reviewed the report published as part of the Friston Surface Water Management Plan and the findings confirmed the existing understanding of surface water flow paths. The Applicants requested the results files on from SCC on 16.03.2021 and received them on 22.03.2021. This allowed the Applicants to evaluate the data and summarise depths and velocities within the Outline Operational Drainage Management Plan submitted at Deadline 8 (document reference ExA.AS-3.D8.V4).</p>
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 submitting this SoCG, the ES and FRA adequately characterise the	Agreed	Agreed	Not Agreed	Not Agreed	The Friston Surface Water Management Plan became available in June 2020 which could potentially add further details to the



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		baseline environment in terms of water resources and flood risk.					<p>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 new baseline has been reviewed in detail and updated, where appropriate.</p> <p>The Applicants have reviewed the report published as part of the Friston Surface Water Management Plan and the findings confirmed the existing understanding of surface water flow paths. The Applicants requested the results files on from SCC on 16.03.2021 and received them on 22.03.2021. This allowed the Applicants to evaluate the data and summarise depths and velocities within the Outline Operational Drainage Management Plan submitted at Deadline 8 (document reference ExA.AS-3.D8.V4).</p>
LA-05.05	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	The Councils agreed with this statement subject to a commitment from the Applicants to undertake appropriate infiltration testing pre-construction. Further survey data may also be required to facilitate the production



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							of a detailed hydraulic model, as part of detailed design. Within the Outline Operational Drainage Management Plan (document reference ExA.AS-3.D8.V4) the Applicants have presented an infiltration only layout solution. The LLFA consider that this demonstrates that an infiltration only solution (utilising 10mm/hr and FoS 10) can be accommodated within the Order Limits when considered in isolation and this will be subject to review within the detailed design post consent.
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 during construction.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils' position is based on the lack of assessment on human receptors in Friston, linked specifically to the Main River located in Friston and its associated catchment (not at a location downstream with a larger catchment). The potential impacts of 'increased sediment supply' & 'changes to surface water runoff and flood risk' during construction are reliant on primary mitigation. A receptor should not be excluded from assessment based on the delivery of primary mitigation. The deliverability of said mitigation within the Order Limits is yet to be demonstrated for the construction phase.</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>The updated Outline CoCP submitted at Deadline 8 (document reference 8.1) will provide further information on the measures which will be in place to protect surface and groundwater and prevent contaminants such as sediment release from entering the surrounding environment.</p>
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ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-05.08	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects during operation.	Agreed	Agreed	Agreed	Agreed	The Councils' view is that it has been demonstrated that the impacts identified in the EIA can be mitigated within the Order Limits as set out in the Outline Operational Drainage Management Plan (REP6-017) during operation.
LA-05.09	Assessment Methodology	The worst case scenario during construction presented in the assessment as set out in section 11 of the Outline CoCP (document reference 8.1) is appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	The Councils await the Applicants' Deadline 8 submission of the Outline CoCP (document reference 8.1). This matter is under discussion between the Applicants and the Councils.
LA-05.10	Assessment Methodology	The worst case scenario during operation presented in the assessment for infiltration and attenuation scenarios as set out in the Outline Operational Drainage Management Plan (REP6-017) is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-05.11	Assessment Conclusions	The assessment of cumulative impacts during construction between East	Agreed	Agreed	Not Agreed	Not Agreed	The Councils cannot agree to this statement, as the assessment methodology (LA-05.07) has not been agreed.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Anglia ONE North and East Anglia TWO is consistent with the agreed methodologies.					The Applicants will submit an updated Outline CoCP at Deadline 8 (document reference 8.1) which will include a new Appendix (Appendix 3) providing further details on construction drainage management.
LA-05.12	Assessment Conclusions	The conclusions of the assessment of impacts for operation for each project are consistent with the accepted assessment methodologies.	Agreed	Agreed	Agreed	Agreed	The Councils agree to this statement, the methodology (LA-05.08) has now been agreed for operation.
LA-05.13	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	Not Agreed	<p>The Councils cannot agree to this statement, as the proposed mitigation, on which the assessment methodology and impacts are reliant, has not been demonstrated as deliverable within the Order Limits (LA-05.07).</p> <p>The Applicants will submit an updated Outline CoCP at Deadline 8 (document reference 8.1) which will include a new Appendix (Appendix 3) providing further details on construction drainage management.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-05.14	Assessment Conclusions	The assessment of cumulative impacts during construction between East Anglia ONE North and East Anglia TWO is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils cannot agree to this statement, as the assessment methodologies (LA-05.07) have not been agreed, as per LA-05.11.</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, as set out in the Outline CoCP (document reference 8.1).</p>
LA-05.15	Assessment Conclusions	The assessment of cumulative impacts during operation between East Anglia ONE North and East Anglia TWO is consistent with the agreed methodologies.	Agreed	Agreed	Agreed	Agreed	None
LA-05.16	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-05.14 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



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							by virtue of the limited overlap of the Order Limits of the Projects.
LA-05.17	Assessment Conclusions	The assessment of cumulative impacts with future projects is 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-05.18	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 ES (APP-068) and the means for implementation are appropriate and adequate.	Agreed	Agreed	Not Agreed	Not Agreed	The Councils cannot agree to the methodology as proposed (LA-05.07), and in turn cannot agree to either the proposed mitigation or the conclusions of the assessment of impacts (LA-05.13). 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



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Any further mitigation requirements will be considered pre-construction within the development of the design and the final CoCP.					<p>reactive measures being implemented. Whilst potentially suitable mitigation options have been identified, these have not been demonstrated as deliverable within the Order Limits.</p> <p>The Applicants consider that sufficient space is available within the Order limits to accommodate appropriate surface water attenuation measures such as drainage channels along temporary construction haul roads and avoidance of spoil stockpile in strategic areas to allow for the provision of SuDS ponds.</p> <p>The Applicants will submit an updated Outline CoCP at Deadline 8 (document reference 8.1). which will include a new Appendix (Appendix 3) providing further details on construction drainage management.</p>
LA-05.19	Mitigation	The embedded mitigation proposed for the construction of each onshore substation and the National Grid substation set out within Section 20.3.3 , monitoring	Agreed	Agreed	Not Agreed	Not Agreed	The Councils cannot agree to the methodology as proposed (LA-05.07), and in turn cannot agree to either the proposed mitigation or the conclusions of the assessment of impacts (LA-05.11 and LA-05.14). It is noted that a recent similar



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		within Section 20.3.4 of the ES (APP-068) and measures set out within the Outline CoCP (document reference 8.1) 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.					<p>construction project is known to have encountered problems managing surface water during construction. This resulted in ad-hoc reactive measures being implemented. Whilst potentially suitable mitigation options have been identified, these have not been demonstrated as deliverable within the Order Limits.</p> <p>The Applicants will submit an updated Outline CoCP at Deadline 8 (document reference 8,1) which will include a new Appendix (Appendix 3) providing further details on construction drainage management.</p>
LA-05.20	Mitigation	The embedded mitigation proposed for the 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 ES (APP-068) and measures set out within the Outline Operational Drainage Management Plan (document reference	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils agree that the assessment methodology (LA-05.08) and assessment conclusions (LA-05.12 & LA-05.15) for the operational phase are adequate. This is on the basis that options to mitigate identified impacts have been demonstrated as deliverable within the Order Limits, as set out in the Outline Operational Drainage Management Plan (REP6-017). However, we cannot agree that these mitigation options are appropriate due to the conflict</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		ExA.AS-3.D8.V4) 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 Operational Drainage Management Plan.					with National and Local Policy & Guidance regarding the surface water disposal hierarchy. Further details on this issue have been provided in SCC LLFA's Issue Specific Hearing 4 Written Submission of Oral Case, at Deadline 5 (REP5-054). The Applicants will submit an updated Outline Operational Drainage Management Plan at Deadline 8 (document reference ExA.AS-3.D8.V4).
Draft Development Consent Order							
LA-05.21	Wording of Requirement(s)	The wording of Requirement 22 provided within the draft DCO (document reference 3.1) (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 Outline CoCP (REP6-017).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-05.22	Wording of Requirement(s)	The wording of Requirement 41 provided within the <i>draft DCO</i> (document reference 3.1) (and supporting certified documents) with reference to development of an Operational Drainage Management Plan is appropriate and adequate.	Agreed	Agreed	Agreed	Not Agreed	Suffolk County Council maintains that as Lead Local Flood Authority, it should be the discharging Authority for Requirement 41. East Suffolk Council supports the current wording of Requirement 41 which identifies the relevant planning authority as the discharging authority in consultation with Suffolk County Council and the Environment Agency which will aid the holistic approach to site design.
Other Matters as Required							
LA-05.23	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-05.24	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	Agreed	Agreed	Agreed	Agreed	Any potential Land Drainage Consent applications will be discussed with the Lead Local Flood Authority prior to submission.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		works) at the onshore substation site.					
LA-05.25	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-05.26	Consents and permits	Flood Risk Activities Permit(s) from the Environment Agency are likely to be required for the construction phase (temporary works) along the onshore cable route, where it crosses the Hundred River (Main River).	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-05.27	Surface water drainage	An Environmental Permit, covering flood risk activities, from the Environment Agency may be required to connect the surface water drainage	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		into the Main River (Friston Watercourse) as well as agreement from the Lead Local Flood Authority on discharge rates.					



2.7 Archaeology and Cultural Heritage

31. The Projects have 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.
32. **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
Pre-Application		
26 th April 2018	Meeting	Included: Introduction to the projects, Baseline Environment, Approach to Assessment and Potential Impacts.
23 rd 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 th 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 Raidsend and Friston / surrounds.
Post-Application		
27 th February 2020	Meeting	SoCG meeting 1
23 rd June 2020	Meeting	SoCG meeting 2
3 rd July 2020	Meeting	SoCG meeting 3
7 th October 2020	Meeting	SoCG workshop
17 th March 2021	Meeting – Archaeology	SoCG meeting 4
17 th March 2021	Meeting – Cultural Heritage	SoCG meeting 5



33. **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).
34. **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
Environmental Impact Assessment							
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	Not Agreed but scope of works to reach agreement have been approved	Not Agreed but scope of works to reach agreement have been approved	The Councils' agreement is subject to the matters below in LA- 06.03, LA-06.04, and LA-06.05. The geophysics survey is sufficient but completion of the earthworks survey and metal detecting survey is still pending. SCCAS are happy with the agreed scope of planned works but they need to be undertaken for SCCAS to fully agree the statement.
LA-06.03	Existing Environment	Notwithstanding the survey locations for which access was not granted, the trial trenching campaign undertaken by the Applicants (REP1-024), in combination with the geophysical survey results, provide sufficient high-level information to inform the	Agreed	Agreed	Not Agreed but scope of works to reach agreement have been approved	Not Agreed but scope of works to reach agreement have been approved	The Applicants submitted a <i>Pre-Construction Trial Trenching Report</i> (REP1-024), which provides further information on the additional trial trenching undertaken since submission of the Applications, to the Examination at Deadline 1. The Councils agree that where trial trenching has been undertaken, the results support high



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		assessment of the significance and character of archaeological remains within the onshore cable corridor.					<p>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> <p>Large sections of the cable corridor, including not all pinch point locations, have been evaluated. SCCAS are happy with the agreed scope of planned works but they need to be undertaken for SCCAS to fully agree the statement.</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.</p>
LA-06.04	Existing Environment	The trial trenching campaign undertaken at the landfall and at Grove Road by the Applicants (REP1-024), in combination with the geophysical survey results, provide sufficient high-level information on the date and character of sites to inform the	Agreed	Agreed	Not Agreed but scope of works to reach agreement have been approved	Not Agreed but scope of works to reach agreement have been approved	<p>The Applicants submitted a <i>Pre-Construction Trial Trenching Report</i> (REP1-024), 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</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		assessment of the significance and character of archaeological remains at these locations.					<p>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 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 Chapter 24 (APP-072). This matter remains under discussion.</p> <p>Landfall and Grove Road have not been evaluated to date. SCCAS are happy with the agreed scope of planned works but they need to be undertaken for SCCAS to fully agree the statement.</p>
LA-06.05	Existing Environment	Sufficient intrusive survey data has been collected to inform the assessment	Agreed	Agreed	Not Agreed but scope of works to reach	Not Agreed but scope of works to reach	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



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
					agreement have been approved	agreement have been approved	<p>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 submitted a REP1-024), 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 <i>draft DCO</i> (document updated at Deadline 8, document reference 3.1) 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 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>



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. SCCAS are happy with the agreed scope of planned works but they need to be undertaken for SCCAS to fully agree the statement.
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 but scope of works to reach agreement have been approved	Not Agreed but scope of works to reach agreement have been approved	<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 submitted a Pre-Construction Trial Trenching Report (REP1-024), 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 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>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>The Applicants have given further consideration to the parish / Hundred boundary within the Archaeology and Cultural Heritage Clarification Note (REP1-021) submitted into the Examination at Deadline 1.</p> <p>Requirement 19 and Requirement 20 of the draft DCO (document reference 3.1) 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 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) which are anticipated to commence in 2021. SCCAS are happy with the agreed scope of planned works but they need to be undertaken for SCCAS to fully agree the statement.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-06.07	Existing Environment	The baseline environment presented within the ES has been adequately understood.	Agreed	Agreed	Not Agreed but scope of works to reach agreement have been approved	Not Agreed but scope of works to reach agreement have been approved	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 Section 24.3.2 and Table 24.2 of the assessment (APP-072) 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-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 impacts between East Anglia TWO and East Anglia ONE North 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



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							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 Section 24.3.3 of the ES (APP-072) are appropriate industry standard approaches to be applied on a case-by-	Agreed	Agreed	Agreed	Agreed	<p>The Applicants have reviewed the Councils comments on the Outline Written Scheme of Investigation (WSI) (REP6-005) and have incorporated changes.</p> <p>The Councils are happy with the Outline WSI submitted at Deadline 6 (REP6-005).</p> <p>The Applicants have committed to further pre-construction archaeological surveys (trial</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		case, area-by-area and/or site-by-site basis.					trenching) which are anticipated to commence in 2021. The Applicants believe the commitment to 5% sampling of the onshore development area plus ongoing consultation with the Councils regarding appropriate subsequent mitigation will address the Councils' concerns that insufficient intrusive survey data will be collected.
Draft Development Consent Order							
LA-06.16	Wording of Requirement(s)	The wording of Requirement 19 provided within the dDCO (document updated at Deadline 8, document reference 3.1) (and supporting certified documents) with reference to development of a pre-commencement archaeology execution plan to detail the scope of the archaeological works is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	None
LA-06.17	Wording of Requirement(s)	The wording of Requirement 20 provided within the dDCO	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		(document updated at Deadline 8, document reference 3.1) (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.					
Other Matters as Required							
LA-06.18	Relationship between onshore preparation works and pre-construction archaeological investigation documents	The Outline Pre-Commencement Archaeology Execution Plan adequately secures appropriate archaeological measures for the onshore preparation works commitments (activities, responsibilities, timescales and locations).	Agreed	Agreed	Agreed	Agreed	<p>The Applicants confirm that the Outline PCAEP (REP1-019) has been updated and is approved by the Councils.</p> <p>The final PCAEP will be drafted post consent and will be sent to the Councils for agreement.</p>

**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
Environmental Impact Assessment							
LA-07.01	Existing Environment	Sufficient information and data have been collected to characterise the baseline environment in terms of heritage setting.	Agreed	Agreed	Agreed	Agreed	<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 Applicants consider 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 Applicants submitted an Archaeology and Cultural Heritage Clarification Note (REP1-021) at Deadline 1, which included the PRow and parish boundary within the baseline and considered 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
							<p>The Councils responded in 'Comments on Applicants Additional Information Submitted at Deadline 1' (REP2-029).</p> <p>The Applicants provided a Heritage Assessment Addendum (REP4-006) at Deadline 4.</p> <p>The Councils responded in 'East Suffolk Council's Response to Additional Information Submitted by Applicants at Deadline 4' (REP5-048).</p>
LA-07.02	Existing Environment	The baseline environment presented within the ES has been adequately understood.	Agreed	Agreed	Agreed	Agreed	<p>The Applicants submitted an Archaeology and Cultural Heritage Clarification Note (REP1-021) at Deadline 1, which included the PRoW and parish boundary within the baseline and considered its influence as an element of the historic landscape character.</p> <p>The Councils responded in 'Comments on Applicants Additional Information Submitted at Deadline 1' (REP2-029).</p> <p>The Applicants provided a Heritage Assessment Addendum (REP4-006) at Deadline 4.</p> <p>The Councils responded in 'East Suffolk Council's Response to Additional Information Submitted by Applicants at Deadline 4' (REP5-048).</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	Agreed	Agreed	<p>The Applicants submitted an Archaeology and Cultural Heritage Clarification Note (REP1-021) at Deadline 1, which included the PRow and parish boundary within the baseline and considered its influence as an element of the historic landscape character.</p> <p>The Councils responded in 'Comments on Applicants Additional Information Submitted at Deadline 1' (REP2-029). The Applicants provided a Heritage Assessment Addendum (REP4-006) at Deadline 4.</p> <p>The Councils responded in 'East Suffolk Council's Response to Additional Information Submitted by Applicants at Deadline 4' (REP5-048).</p>
LA-07.05	Assessment Methodology	The approach to scoping out construction phase impacts upon 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
		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 Section 24.3.2 ; and Table 24.2 Realistic Worst Case Scenarios (APP-072), and Section 3 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 consistent with the	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
		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	Not Agreed	<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>Applicants consider 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 section 24.6.2.1 are based on and supported by this independent study (Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes (APP-519)).</p> <p>The Applicants have provided an Archaeology and Cultural Heritage Clarification Note (REP1-021) which includes the PRow and parish boundary within</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>the baseline and considers its influence as an element of the historic landscape character.</p> <p>The Councils responded in 'Comments on Applicants Additional Information Submitted at Deadline 1' (REP2-029).</p> <p>The Applicants provided a Heritage Assessment Addendum (REP4-006) at Deadline 4.</p> <p>The Councils responded in 'East Suffolk Council's Response to Additional Information Submitted by Applicants at Deadline 4' (REP5-048).</p>
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	Not Agreed	<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>The Applicants consider in order to produce an accurate assessment of the contribution of historical setting to significance, an independent contractor (Headland Archaeology) was commissioned by the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Applicants. The subsequent conclusions and narrative provided in section 24.6.2.1 are based on and supported by this independent study (Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes (APP-519)). The Applicants are therefore of the view that an understanding of the historic landscape character 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 Section 24.3.3 of	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		the ES (APP-072) are designed to not cause further harm to the setting of heritage assets.					
LA-07.12	Mitigation	The embedded and additional mitigation measures proposed within Section 24.3.3 of the ES (APP-072) minimise adverse impacts to the setting of heritage assets.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils believe that the assessed impacts on the setting of heritage assets cannot be fully mitigated by new planting. The planting would provide a degree of screening, but it is not considered that this would lower the significance of the impact on the assets.</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 OLEMS (document reference 8.7) which seeks, among other objectives, to reduce adverse impacts on the heritage assets at Friston. The OLEMS 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</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							village. This allows the 'setting' of Friston to be retained (rather than being contained by woodland).
Draft Development Consent Order							
LA-07.13	N/A	N/A	N/A	N/A	N/A	N/A	None
Other Matters as Required							
LA-07.14	Landscape Planting	The Applicants have proposed all reasonable landscape planting mitigation measures to minimise the effects on heritage assets of the permanent onshore substations.	Agreed	Agreed	Agreed	Agreed	The Councils agree that the landscape planting mitigation measures have been explored to their full potential in regard to minimising the effects of the permanent onshore infrastructure on the setting of the heritage assets. However, the significance of the impacts on the heritage assets is considered to be the same with or without the planting (as explained in ESC response at Deadline REP5-048).



2.8 Noise and Vibration

35. 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.
36. **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
Pre-Application		
26 th April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
29 th January 2019	Meeting	Initial results from the impact assessment, project updates
7 th May 2019	Meeting	Impact assessment methodology and approach
Post-Application		
7 th February 2020	Meeting	SoCG meeting 1
7 th October 2020	Meeting	SoCG workshop
22 nd March 2021	Meeting	SoCG meeting 2

37. **Table 18** presents the matters agreed or not agreed between the Applicants and the Councils in relation to operation phase noise and vibration.
38. **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
Environmental Impact Assessment							
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	Not Agreed	Despite there remaining some technical differences regarding the background sound levels, the Applicants and Councils have agreed the controls secured through updates to the Substation Design Principles Statement (document reference ExA.AS-4.D8.V2), the wording of Requirement 12 and Requirement 27 of the draft DCO (document reference 3.1) submitted at Deadline 8. Refer also to statements LA-08.15 and LA-08.16.
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
LA-08.04	Assessment Methodology	BS4142:2014 +A1:2019 has been applied appropriately in terms of context.	Agreed	Agreed	Not Agreed	Not Agreed	There remain technical differences regarding the application of BS4142:2014 +A1:2019, resulting in differences of opinion of the level at



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>which adverse impacts will occur. Despite this the Applicants and Councils have agreed further controls secured through updates to the Substation Design Principles Statement (document reference ExA.AS-4.D8.V2), the wording of Requirement 12 and Requirement 27 of the draft DCO (document reference 3.1) submitted at Deadline 8.</p> <p>Refer also to statements LA-08.15 and LA-08.16.</p> <p>The Councils are therefore agreed that significant adverse impacts will be avoided.</p>
LA-08.05	Assessment Methodology	The operational noise modelling methodology provides an appropriate approach to assessing potential impacts of the Projects.	Agreed	Agreed	Agreed	Agreed	<p>The Councils agree with this statement subject to Requirement 12 of the draft DCO and the Substations Design Principles Statement being updated at Deadline 8.</p> <p>At Deadline 8 the Applicants have submitted an updated draft DCO (document reference 3.1) and Substations Design Principles Statement (document reference ExA.AS-4.D8.V2) with a pre-commencement requirement in relation to operational noise, the wording of which has been agreed with the Councils.</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	BS4142 is the appropriate method of assessing noise levels and potential impacts.	Agreed	Agreed	Agreed	Agreed	None
LA-08.07	Assessment Methodology	The worst case scenario(s) presented for one project alone in Table 25.2, Chapter 25 of the ES (APP-073) is appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils consider the impact of the noise from the National Grid infrastructure should have been included within the assessment.</p> <p>Whilst this statement remains not agreed the Councils note the updates to the wording of Requirement 27 of the draft DCO (document reference 3.1), along with the updates to Requirement 12 of the draft DCO and the Substations Design Principles Statement submitted at Deadline 8 (document reference ExA.AS-4.D8.V2) to secure a pre-commencement noise requirement, which is considered to adequately control cumulative effects.</p>
LA-08.08	Assessment Methodology	The assessment of non-residential receptors and amenity space is sufficient.	Agreed	Agreed	Agreed	Agreed	None
LA-08.09	Assessment Methodology	The timing of the baseline noise monitoring surveys is representative of the annual existing noise environment.	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-08.10	Assessment Conclusions	The conclusions of the assessment of impacts for the operation phase presented are appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>There remain technical differences regarding the application of BS4142:2014 +A1:2019, resulting in differences of opinion of the level at which adverse impacts will occur. Despite this the Applicants and Councils have agreed further controls secured through updates to the Substation Design Principles Statement (document reference ExA.AS-4.D8.V2), the wording of Requirement 12 and Requirement 27 of the draft DCO (document reference 3.1) submitted at Deadline 8.</p> <p>Refer also to statements LA-08.15 and LA-08.16.</p> <p>The Councils are therefore agreed that significant adverse impacts will be avoided.</p>
LA-08.11	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	Not Agreed	<p>There remain technical differences regarding the application of BS4142:2014 +A1:2019, resulting in differences of opinion of the level at which adverse impacts will occur. Despite this the Applicants and Councils have agreed further controls secured through updates to the Substation Design Principles Statement (document reference ExA.AS-4.D8.V2), the wording of Requirement 12 and Requirement 27 of the draft DCO (document reference 3.1) submitted at Deadline 8.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Refer also to statements LA-08.15 and LA-08.16. The Councils are therefore agreed that significant adverse impacts will be avoided.
LA-08.12	Assessment Conclusions	The assessment of cumulative impacts with Sizewell C is appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-08.13	Assessment Conclusions	The assessment of cumulative impacts with future projects is appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	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. See paragraph 13 of this SoCG for further information on the Council's and Applicants' position on the CIA.
LA-08.14	Mitigation	The approach to mitigating operation phase noise at the detailed design stage is appropriate and proportionate.	Agreed	Agreed	Agreed	Agreed	The Councils agree with this statement subject to the Requirement 12 of the <i>draft DCO</i> and the <i>Substations Design Principles Statement</i> being updated at Deadline 8.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							At Deadline 8 the Applicants have submitted an updated draft DCO (document reference 3.1) and Substations Design Principles Statement (document reference ExA.AS-4.D8.V2) with a pre-commencement requirement in relation to operational noise, the wording of which has been agreed with the Councils.
Draft Development Consent Order (DCO)							
LA-08.15	Wording of DCO Requirement(s)	Requirement 27 of the draft DCO (document reference 3.1) (and supporting certified documents) for the mitigation of cumulative operational impacts with respect to noise and vibration are considered appropriate and proportionate. The maximum operational noise rating levels specified within Requirement 27 of the draft DCO are acceptable.	Agreed	Agreed	Agreed	Agreed	<p>The maximum operational noise rating levels secured through Requirement 27 are the lowest levels that can be agreed based on the Applicants discussions with potential suppliers.</p> <p>The Applicants have updated the wording of Requirement 12 of the draft DCO (document reference 3.1) and the Substations Design Principles Statement at Deadline 8 (document reference ExA.AS-4.D8.V2) with a pre-commencement noise requirement (refer to LA-08.20).</p> <p>The Councils accept the rating limits provided within Requirement 27 based on the Applicants statement that this is the lowest level currently achievable and due to the commitment within the Substation Design Principles Statement secured by Requirement 12 to adopt Best Practicable Means to reduce the limits further</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							at the detailed design stage where commercially and practically viable.
LA-08.16	Wording of DCO Requirement(s)	Requirement 12 of the draft DCO (APP-023) (and supporting certified documents) relating to the detailed design parameters onshore, are considered appropriate and proportionate.	Agreed	Agreed	Agreed	Agreed	<p>The Applicants have updated the wording of Requirement 12 of the draft DCO (document reference 3.1) at Deadline 8 with reference to submitting a pre-commencement noise report for approval by the relevant planning authority.</p> <p>The Substations Design Principles Statement (document reference ExA.AS-4.D8.V2) has also been updated to provide further information to be included within the pre-commencement noise report, including reference to the National Grid substation (Work No. 41).</p>
Other Matters as Required							
LA-08.17	Consideration of Alternatives	Irrespective of the choice of technology for the National Grid substation (Air Insulated or Gas Insulated), the maximum operational noise rating levels specified within Requirement 27 of the draft DCO apply.	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-08.18	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	Not Agreed	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
Environmental Impact Assessment							
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 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 was submitted to the Examinations at Deadline 2 (REP2-011) and a</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							Noise Modelling Clarification Note was submitted to the Examinations at Deadline 4 (REP4-043).
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	Not Agreed	The Applicants and the Councils note that the assessment represents a snapshot in time and the Outline CoCP (document reference 8.1) updated at Deadline 8 now provides measures to ensure that significant adverse impacts will be avoided. Refer also to the notes at statement LA-09.20.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-09.07	Assessment Conclusions	The assessment of construction and decommissioning phase noise impacts presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
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	Not Agreed	The Applicants and the Councils note that the assessment represents a snapshot in time and the Outline CoCP (document reference 8.1) updated at Deadline 8 now provides measures to ensure that significant adverse impacts will be avoided. Refer also to the notes at statement LA-09.20.
LA-09.10	Assessment Conclusions	The assessment of construction and decommissioning phase vibration impacts presented are appropriate.	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
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 noise and vibration impacts with Sizewell C New Nuclear Power Station is appropriate.	Agreed	Agreed	Agreed	Agreed	The Applicants submitted a Sizewell C CIA (Traffic and Transport) Clarification Note at Deadline 2 and updated this note again for Deadline 6 (REP6-043).
LA-09.14	Assessment Conclusions	The assessment of cumulative construction phase vibration and noise impacts with other future projects is 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 Council's and Applicant's position on the CIA.</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-09.15	Mitigation	The proposed mitigation of construction phase noise is appropriate and proportionate.	Agreed	Agreed	Agreed	Agreed	The approach to applying for Section 61 consent as outlined in the Outline CoCP (document reference 8.1) is accepted by the Councils.
Draft Development Consent Order							
LA-09.16	Wording of DCO Requirement(s)	Requirement 22(2)(c) of the draft DCO (document reference 3.1) (and supporting certified documents) for the mitigation of construction impacts with respect to noise and vibration are considered appropriate and proportionate.	Agreed	Agreed	Agreed	Agreed	None
LA-09.17	Wording of DCO Requirement(s)	Requirement 23 of the draft DCO (document reference 3.1) relating to construction hours for transmission works is appropriate.	Agreed	Agreed	Agreed	Agreed	The Councils accept the wording of Requirement 23 subject to the agreed updates being made at Deadline 8.
LA-09.18	Wording of DCO Requirement(s)	Requirement 24 of the draft DCO (document reference 3.1) relating to construction hours for grid connection works is appropriate.	Agreed	Agreed	Agreed	Agreed	The Councils accept the wording of Requirement 24 subject to the agreed updates being made at Deadline 8.



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-09.19	Wording of DCO Requirement(s)	Requirement 26 of the draft DCO (document reference 3.1) (and supporting certified documents) for the mitigation of	Agreed	Agreed	Agreed	Agreed	None
Other Matters as Required							
LA-09.20	Outline Code of Construction Practice (document reference 8.1)	Measures presented within the OCoCP (document reference 8.1) secure appropriate and sufficient provisions for the control of construction noise.	Agreed	Agreed	Agreed	Agreed	<p>The Councils support the commitment within the OCoCP that prior consent under s61 of COPA will be obtained and the impact from construction noise will be assessed using the ABC method set out in BS5228.</p> <p>The Councils also support the identification of sensitive areas in close proximity to the Order Limits and the commitment from the Applicants to provide additional measures to protect these areas.</p> <p>The Councils would also like to note that while we understood there to be general agreement on the principles of adopting LOAEL and SOAEL values, working times and averaging periods, as discussed in ISH12, ESC considers that lower LOAEL and SOAEL values would be appropriate in this case (such as those presented in the Standard for Highways document DMRB LA 111 - Noise and vibration which was previously promoted by SASES and</p>



ID	Topic	Statement	East Anglia TWO Limited	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>is discussed in the Expert Report on Noise) and although in agreement with incorporating the principles ESC does not agree with the specific values having any status.</p> <p>However, the Councils are satisfied that the principle of thresholds for adverse and significant adverse impacts reflect a valid expression of policy and that the measures presented within the OCoCP (document reference 8.1) now secure acceptable provisions for the control of construction noise.</p>



2.9 Traffic and Transport

39. 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.
40. **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
Pre-Application		
26 th April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, study area, impacts, data collection, etc.)
8 th May 2018	Meeting	Baseline and study area refinement
18 th July 2018	Meeting	Approach to road safety audit, driver delay baseline and assessment methodology
18 th September 2018	Meeting	Discussion on traffic distribution methodology, highways improvements, traffic demand and delivery routes
21 st January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
13 th May 2019	Meeting	Traffic forecasts, worst case assessment parameters and travel plans arrangements
Post-Application		
24 th March 2020	Meeting	SoCG Meeting 1
25 th June 2020	Meeting	SoCG Meeting 2
20 th July 2020	Meeting	SoCG Meeting 3
29 th September 2020	Meeting	SoCG Meeting 4
26 th January 2021	Meeting	SoCG Meeting 5



Date	Contact Type	Topic
5 th February 2021	Meeting	SoCG Meeting 6
11 th February 2021	Meeting	SoCG Meeting 7
22 nd February 2021	Meeting	SoCG Meeting 8
16 th March 2021	Meeting	SoCG Meeting 9

41. **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.
42. 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[‡] 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.

[‡] 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
Environmental Impact Assessment							
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	Agreed	Agreed	<p>The Applicants have prepared a clarification note (REP1-048) on changes to driver delay over time that examines a later peak year of 2028 and associated baseline conditions. In addition, the modelling presented in <i>Traffic and Transport Clarification Note</i> (REP4-027) contains a 2028 scenario to test the robustness of the Friday Street traffic signal scheme.</p> <p>The Councils have reviewed the information and are content the baseline traffic and transport conditions are adequately characterised.</p>
LA-10.03	Assessment Methodology	The impact assessment methodologies used for the EIA provide an acceptable approach	Agreed	Agreed	Agreed	Agreed	The Applicants have engaged with SCC to find common ground for the EIA. Noting that SCC has some



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		to assessing potential impacts of the Projects.					reservations regarding application of the Guidelines for the Environmental Assessment of Road Traffic (GEART), the discussions focused on impact outcomes (rather than EIA nuance). Following this engagement, the Councils are satisfied that the methodology identifies all the Projects' impacts and cumulative impacts.
LA-10.05	Assessment Methodology	No assessment of port access traffic is presented within the ES. Such facilities would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights.	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 draft DCO (REP7-006) requires a Port Construction Traffic Management Plan and a Port Travel Plan to be submitted to and approved by the relevant highway authority.</p> <p>An updated Outline Port Construction Traffic Management and Travel Plan has been submitted</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							at Deadline 8 (document reference ExA.AS-9.D8.V3) the contents of which have been amended in accordance with feedback received from SCC. It is clarified that the Outline Port Construction Traffic Management and Travel Plan provides a framework of measures to be developed in a final Port Construction Traffic Management Plan (offshore construction phase) and Port Travel Plan (offshore operational management phase).
LA-10.06	Assessment Methodology	The realistic worst case scenario for one project, in terms of peak HGV movements presented within Chapter 26 Traffic and Transport (APP-074), is acceptable assuming a construction commencement year of 2023.	Agreed	Agreed	Agreed	Agreed	<p>The Councils agree that the worst case scenario for the year 2023 is presented.</p> <p>The Applicants confirm that the Outline CTMP (document reference 8.9) and Outline Travel Plan (document reference 8.11) include measures to control traffic flows to that assessed within Chapter 26 Traffic and Transport (APP-074) and include measures to monitor such traffic flows.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
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 Appendix 26.2 of the ES (APP-074) is acceptable assuming a construction commencement year of 2023.	Agreed	Agreed	Agreed	Agreed	<p>The Councils agree that the worst case scenario for the year 2023 is presented.</p> <p>The Applicants confirm that the Outline CTMP (document reference 8.9) and Outline Travel Plan (document reference 8.11) include measures to control traffic flows to that assessed within Chapter 26 Traffic and Transport (APP-074) and include measures to monitor such traffic flows.</p>
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	Agreed	Agreed	<p>The Councils have requested evidence that a delayed construction start will not materially change the driver delay assessment outcomes.</p> <p>The Applicants have prepared a clarification note (REP1-048) to address this matter by examining a later peak year of 2028 and associated baseline conditions. In addition, the modelling presented in Traffic and Transport Clarification Note (REP4-027) contains a 2028 scenario to test</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>the robustness of the Friday Street traffic signal scheme.</p> <p>The Councils have reviewed the information and are content the baseline traffic and transport conditions are adequately characterised.</p>
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 SZC is acceptable.	Agreed	Agreed	Agreed	Agreed	<p>The submission of a revised SZC transport strategy to the Planning Inspectorate (SZC Examination Library Reference AS-266) has necessitated a review of the cumulative impacts. To inform this review the Applicants have engaged with SCC to find common ground on the cumulative assessment and understand the consequences for a revised SZC transport strategy.</p> <p>The Applicants agreed to undertake pedestrian amenity mitigation at Link 2 (the A12 through Yoxford) and Link 3</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>(the A12 through Marlesford), in the form of footway improvements proportionate to the Projects' contribution to the cumulative impact. These improvements would not conflict with future schemes proposed by SZC or SCC.</p> <p>An updated the Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) (REP6-043) has been submitted to the examination at Deadline 6.</p> <p>SCC is now satisfied that the cumulative impacts with SZC have been identified and suitable mitigation included within the Outline CTMP (document reference 8.9).</p>
LA-10.11	Assessment Methodology	The assumed vehicle occupancy rate presented within the Outline Travel Plan (document reference 8.11) is acceptable.	Agreed	Agreed	Agreed	Agreed	The Councils agree with this statement following the update of the Outline Travel Plan (document reference 8.11) with acceptable monitoring and control measures of the vehicle occupancy rate.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.12	Assessment Conclusions	The conclusions presented within Chapter 26 Traffic and Transport (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 within Chapter 26 Traffic and Transport (APP-074) are acceptable.	Agreed	Agreed	Agreed	Agreed	None
LA-10.14	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon link severance presented within Chapter 26 Traffic and Transport (APP-074) are acceptable.	Agreed	Agreed	Agreed	Agreed	None
LA-10.15	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon road safety presented within Chapter 26	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Traffic and Transport (APP-074) are acceptable.					
LA-10.16	Assessment Conclusions	The conclusions of the assessment of construction phase impacts upon driver delay in terms of capacity presented within Chapter 26 Traffic and Transport (APP-074) are acceptable.	Agreed	Agreed	Agreed	Agreed	The Outline CTMP (document reference 8.9) has been updated with a commitment to keep to defined HGV routes.
LA-10.17	Assessment Conclusions	The conclusions of the assessment of construction phase impacts (workers and HGVs) upon driver delay in terms of highway geometry presented within Chapter 26 Traffic and Transport (APP-074) are acceptable.	Agreed	Agreed	Agreed	Agreed	The Councils accept the construction phase impacts of construction traffic (workers and HGVs) with the exception of AIL load movements. The Applicants have provided information on the scale of likely AIL movements (REP1-048) and will engage with stakeholders to plan movements and minimise disruption.
LA-10.18	Assessment Conclusions	The conclusions of the assessment of impacts for operation presented within Chapter 26 Traffic and Transport (APP-074) are acceptable.	Agreed	Agreed	Agreed	Agreed	The Councils agree with this statement with the exception of abnormal loads noting the Applicants opinion that no AILs will be necessary in the operational phase of the Projects



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		Transport (APP-074) are acceptable.					except in the event of an unforeseen failure. The Applicants respond to the matter of operational AIL routes at statement LA-10.38.
LA-10.19	Assessment Conclusions	The transport impacts of decommissioning will be assessed in the onshore decommissioning plan submitted and approved by the relevant planning authority as stated in Requirement 30	Agreed	Agreed	Agreed	Agreed	Requirement 30 (Onshore Decommissioning) of the draft DCO (document reference 3.1) requires an onshore decommissioning plan to be submitted to and approved by the relevant planning authority. This onshore decommissioning plan will confirm transport routes and controls which will be adopted during decommissioning and reflect the nature of the highway network at the time.
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



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.21	Assessment Conclusions	The assessment conclusions of cumulative impacts with the proposed SZC project are acceptable.	Agreed	Agreed	Agreed	Agreed	The Applicants have made a commitment to undertake footpath works at Yoxford and Marlesford. The Councils accept that the offsite highway works set out in the Outline CTMP (document reference 8.9) mitigate the cumulative impacts of SZC and East Anglia ONE North and / or East Anglia TWO.
LA-10.22	Assessment Conclusions	The assessment conclusions of cumulative impacts with the committed development detailed in Chapter 26 Traffic and Transport (APP-074) are acceptable.	Agreed	Agreed	Agreed	Agreed	None
LA-10.23	Mitigation	The mitigation controls and monitoring set out within the Outline CTMP (document reference 8.9) and Outline AMP (document reference 8.10) are acceptable and sufficient to mitigate traffic and transport impacts to an acceptable and proportionate level.	Agreed	Agreed	Agreed	Agreed	The Councils are satisfied that the following mitigation measures are proposed: <ul style="list-style-type: none"> • A12/A1094 junction (see LA-025); • A12 Yoxford; • A12 Marlesford;



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"> • A1094 Snape; and • B1122 Theberton. <p>While the Councils consider that impacts were identified at Lovers Lane, Leiston, it accepts that the highway changes proposed by SZC change the highway network to such a degree that identifying appropriate mitigation is not practical.</p>
LA-10.24	Mitigation	The measures to reduce travel by single-occupancy vehicles presented within the Outline Travel Plan (document reference 8.11) are acceptable and sufficient to mitigate traffic and transport impacts to an acceptable level.	Agreed	Agreed	Agreed	Agreed	None
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 to	Agreed	Agreed	Agreed	Agreed	The Councils appreciate the efforts that have been made by the Applicants in looking to address concerns relating to road safety at A12 / A1094 Friday Street junction and confirms that we are satisfied with the



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		mitigate traffic and transport impacts to an acceptable level.					'concept' design (SCC-REP4-027). A Section 278 agreement (Highways Act) will be entered into to deliver these and other off site highway mitigation works (REP6-010).
Draft Development Consent Order							
LA-10.26	Wording of Requirement (s)	The wording of Requirement 16 with regard to Highway accesses provided within the draft DCO (document reference 3.1) (and supporting certified documents) with reference to development of a written scheme in accordance with the Outline AMP (document reference 8.10) for the specification and management of vehicular access to a highway is acceptable and adequate.	Agreed	Agreed	Agreed	Agreed	The Applicants note that Part 3, Article 13 of the draft DCO (document reference 3.1) provides the Applicants the legal right 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 draft DCO (document reference 3.1)).
LA-10.27	Wording of Requirement (s)	The wording of Requirement 28 with respect to traffic management provided within the	Agreed	Agreed	Agreed	Agreed	The Councils clarified that in the event SZB or SZC construction traffic conflicts with the Projects' highway



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		draft DCO (document reference 3.1) (and supporting certified documents) with reference to development of a construction traffic management plan and a travel plan is appropriate and adequate.					<p>alteration works, the Applicants may find it challenging to deliver highway mitigation works (as the background traffic flow will be too high for daytime closures).</p> <p>The Applicants confirm that they will monitor the forecast SZB and SZC construction programme and where constraints are identified for establishing the Projects' highway alterations, the Applicants will liaise with EDF / NNB (SZB / SZC) to establish the precise timing and nature of their construction works and identify any interface between the projects that can be considered at an early stage.</p>
LA-10.28	Draft DCO Content	The wording of Requirement 36 with respect to development of a Port Construction Traffic Management Plan and Port Travel Plan within the draft DCO (document reference 3.1) (and supporting certified documents) is appropriate and adequate.	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-10.29	Draft DCO Content	The streets included within Schedule 2 Streets subject to street works within the draft DCO (document reference 3.1) are accurate and acceptable.	Agreed	Agreed	Agreed	Agreed	None
LA-10.30	Draft DCO Content	The streets included within Schedule 5 Streets to be temporarily stopped up within the draft DCO (document reference 3.1) are accurate and acceptable.	Agreed	Agreed	Agreed	Agreed	The Councils note that the stopping up of streets should not conflict with the Applicants proposed traffic management as set out in the Outline CTMP (document reference 8.9) and Outline AMP (document reference 8.10).
LA-10.31	Draft DCO Content	The accesses included within Schedule 6 Access to works within the draft DCO (document reference 3.1) are acceptable The details of the Access to Works provided in Schedule 6 of the draft DCO (document reference 3.1) are accurate and acceptable.	Agreed	Agreed	Agreed	Agreed	The Councils note that detailed design of the accesses will be agreed in LA-10.26 and a Planning Performance Agreement (PPA) will be entered into for the technical approvals (refer to the notes at statement LA-10.34).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.32	Outline CTMP	The Outline CTMP (document reference 8.9) embeds the commitments made in the ES through monitoring and acceptable control measures.	Agreed	Agreed	Agreed	Agreed	The Applicants note that a PPA (outlined in the Outline CTMP (document reference 8.9)) will be entered into with SCC in due course and will address costs incurred by SCC during delivery of the Projects (refer to the notes at statement LA-10.34).
LA-10.33	Outline Travel Plan	The Outline Travel Plan (document reference 8.11) sets out the principles of how construction personnel traffic would be managed and controlled.	Agreed	Agreed	Agreed	Agreed	None
LA-10.34	Outline AMP	The Outline AMP (document reference 8.10) sets out on the location, frontage, general layout, visibility and embedded mitigation measures for access points to the onshore development area that are acceptable.	Agreed	Agreed	Agreed	Agreed	The Applicants note that a PPA (outlined in the Outline CTMP (document reference 8.9)) will be entered into with SCC in due course and will address costs incurred by SCC during delivery of the Projects. The following clauses have been agreed:



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"> The Applicants have agreed to enter into a Planning Performance Agreement (PPA) with SCC. The PPA will allow SCC to recover reasonable costs for activities including but not limited to the following: Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway[§]; Visual and structural condition surveys of the highway (A1094, B1069, B1122, Lovers Lane, Sizewell Gap and parts of A12) and contributions towards structural repairs; Surveys and assessment of highway structures to facilitate AIL movements; Damage to the Highway (in accordance with the

[§] This could include activities on delivery routes such as clearing visibility splays on critical junctions, refreshing road markings and sign cleaning that would be in addition to SCC cyclic maintenance regimes.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>provisions of Section 59 Highways Act 1980”);</p> <ul style="list-style-type: none"> • Creation of temporary traffic regulation orders (including SCC consultation and issue of permits); • Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements; • Technical approval and inspection of highway accesses (Requirement 16), Works No.35, Works No.37, Church Road Friston traffic management and cable crossings as detailed in the approved Construction Traffic Management Plan; and • Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PRow Strategy etc).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.35	Temporary Speed Limits	Inclusion of temporary speed limit provisions within the <i>draft DCO</i> (document reference 3.1) is an appropriate means to secure and implement temporary speed limit reductions required for the Projects.	Agreed	Agreed	Agreed	Agreed	The Applicants have confirmed they will be entering into a PPA that makes provisions for SCC to raise temporary traffic regulation orders.
LA-10.36	Onshore Preparation Works	Provision of Requirement 26 within the <i>draft DCO</i> (document reference 3.1) requiring the production and approval of an Onshore Preparation Works Management Plan is an appropriate means to control onshore preparation works.	Agreed	Agreed	Agreed	Agreed	None
Other Matters as Required							
LA-10.37	Protection of Local Highways Authority (LHA) Powers and Recovery of Costs	An agreement shall be entered into between the Applicant (and any successors) and the LHA to protect the Authority against any costs arising from the onshore preparation and construction phase of this project and to	Agreed	Agreed	Agreed	Agreed	Until such time as an agreement is in place the LHA retains its position regarding the need for protective provisions. An agreement would remove the LHAs requirement for a planning obligation.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		protect its ability to discharge its duties under the Highways Act and New Roads and Street Works Act (document reference 8.9).					The Applicants note the LHA's need for protective provisions until an agreement has been entered into.
LA-10.38	Operational AIL Routes	The approach to securing designated AIL routes during the operation and decommissioning phase of the Projects is appropriate and acceptable.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils have in-principle concerns with the lack of national policy to address the management of AIL routes and the resilience of the local highway network providing access to the substation site.</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 LHA appreciates the Applicants only need to address their project but notes the likelihood of future energy projects using the same access routes.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-10.39	Good Design Outcomes	<p>The following good design outcomes are forecast for the Projects:</p> <ul style="list-style-type: none"> The large majority of HGV movements routed via the Suffolk Lorry Route Network (96% of HGV movement during construction peak) Reduced local HGV trips facilitated by an onshore haul road and careful positioning of access. For Scenario 1 (Projects constructed simultaneously) minimised HGV demand by sharing activities that would be significant traffic generators such as haul roads, and trenching (ducts would be laid for both Projects). Minimal distance for the onshore transportation of AILs in accordance with 	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		<p>Highways England's 'Water Preferred' policy.</p> <ul style="list-style-type: none"> A mitigation strategy that will integrate with SZC in the event of a temporal overlap with the Projects. 					
LA-10.40	Cost Sharing of Proposed Mitigation Measures	<p>The following mitigation measures have been designed to represent a proportional contribution to cumulative impacts with SZC.</p> <ul style="list-style-type: none"> Marlesford Mitigation Scheme; Yoxford Mitigation Scheme <p>The scope of these schemes represents the Projects' cost sharing of cumulative mitigation.</p> <p>The Applicants and SZC will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the</p>	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		interests of the Applicants and SZC as well as the wider community that all projects be coordinated as far as reasonably practicable.					
LA-10.41	Updates to Revised Mitigation Measures Tracking List (REP7-040) or to Planning Obligations (REP6-034)	<p>The Traffic and Transport mitigation measures presented in the <i>Changes to Mitigation Measures Tracking List</i> (REP7-040) represent the final agreed position.</p> <p>The planning obligations set out in the Deadline 8 <i>Outline CTMP</i> (document reference 8.9) represent the final agreed position.</p>	Agreed	Agreed	Agreed	Agreed	<p>Works No 36 (Friday Street Traffic Signals)</p> <p>The proposed works would be required prior to commencement of Works Nos. 19 to 23, 26, 30, 31, 32, 34, 38 to 43 (with the exception of the creation of highway accesses). It has also been agreed that the works (including the temporary speed limit) would be removed by the Applicants upon completion of construction of the later of the two Projects (East Anglia ONE North or East Anglia TWO) unless instructed otherwise by SCC and in agreement with ESC.</p> <p>Theberton Mitigation Scheme</p> <p>The Applicants will not commence Works Nos. 6, 8, 9, 11, 12, 13, 16, 17, 18 and 19 north of the Hundred River</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>(with the exception of the creation of highway access) until mitigation in accordance with the Theberton Mitigation Scheme is completed.</p> <p>Snape Mitigation Scheme</p> <p>The Applicants will not commence Works Nos. 19 south of the Hundred River, 20 to 23, 26, 30, 31, 32, 33, 34, 38 to 43 (with the exception of the creation of highway accesses) until mitigation in accordance with the Snape Mitigation Scheme is completed.</p> <p>Marlesford Mitigation Scheme</p> <p>The Applicants will not commence Works Nos. 6, 8, 9, 11, 12, 13, 16 to 23, 26, 30, 31, 32, to 34, 38 to 43 (with the exception of the creation of highway accesses) until mitigation in accordance with the Marlesford Mitigation Scheme is completed.</p> <p>Yoxford Mitigation Scheme</p> <p>The Applicants will not commence Works Nos. 6, 8, 9, 11, 12, 13, 16 to</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							23, 26, 30, 31, 32, to 34, 38 to 43 (with the exception of the creation of highway accesses) until mitigation in accordance with the Yoxford Mitigation Scheme is completed.
LA-10.42	Mitigation Legacy	<p>The following off-site highway works are legacy benefits and will be retained after construction:</p> <ul style="list-style-type: none"> • Theberton Mitigation Scheme; • Snape Mitigation Scheme; • Marlesford Mitigation Scheme; and • Yoxford Mitigation Scheme. <p>The offsite mitigation works at the A12 / A1094 Mitigation Scheme is considered temporary and will be removed after construction unless otherwise agreed in writing with</p>	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		the LHA in consultation with the relevant planning authority.					
LA-10.43	Facilitating Legacy	The Applicants and SCC are entering into a Section 278 (Highways Act) agreement to facilitate timely delivery, construction to required technical standards, independent safety audit and future maintenance of the legacy schemes.	Agreed	Agreed	Agreed	Agreed	<p>The following works are included in the S278 agreement:</p> <ul style="list-style-type: none"> • Works No. 36 (Friday Street Traffic Signals) • Theberton Mitigation Scheme; • Snape Mitigation Scheme; • Marlesford Mitigation Scheme; and • Yoxford Mitigation Scheme.



2.10 Human Health

43. 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.
44. **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).
45. Agreements concerning the existing environment, assessment methodology and assessment conclusions with respect to air quality, noise and vibration, traffic and transport and light pollution (offshore) are provided in **Section 2.5**, **Section 2.8**, **Section 2.9**, and **Section 2.11** of this SoCG respectively.

Table 22 Summary of consultation with the Councils regarding human health

Date	Contact Type	Topic
Post-Application		
18 th March 2020	Written Correspondence	First draft SoCG issued to Councils
31 st July 2020	Written Correspondence	Applicants issued updated SoCG to Councils for comment
22 nd October 2020	Written Correspondence	Councils provided comments on SoCG
12 th February 2021	Meeting	SoCG Meeting 1

46. **Table 23** presents the matters agreed or not agreed between the Applicants and the Councils in relation to human health, associated with the outputs and conclusions associated with those topics.

**Table 23 Human Health**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
Environmental Impact Assessment							
LA-11.01	Existing Environment	Sufficient desk-based survey data in relation to air quality has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	Refer to LA-04.01.
LA-11.02	Existing Environment	Sufficient desk-based survey data in relation to noise has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	Refer to LA-08.01 and LA-09.01.
LA-11.03	Existing Environment	Sufficient desk-based survey data in relation to EMF has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None
LA-11.04	Existing Environment	The ES adequately characterises the baseline environment for construction, maintenance and decommissioning noise effects on terrestrial environments in terms of human health.	Agreed	Agreed	Not Agreed	Not Agreed	Refer to LA-08.02.
LA-11.05	Existing Environment	The ES adequately characterises the baseline environment for operational noise and vibration	Agreed	Agreed	Not Agreed	Not Agreed	Refer to LA-08.02.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		effects on terrestrial environments in terms of human health.					
LA-11.06	Existing Environment	The ES adequately characterises the baseline environment for air quality during construction and impact on the AQMA in terms of human health.	Agreed	Agreed	Agreed	Agreed	<p>Baseline data covers PM10 and PM2.5. The Councils considered that baseline data should also include NO₂ with reference to AQMAs (e.g. see para 189 of Chapter 27 Human Health (APP-075) which refers to potential significance of NO₂).</p> <p>The Applicants have submitted an Air Quality Clarification Note at Deadline 1 (REP1-040), which reiterates the background NO₂ levels within the study area (as presented within Chapter 19 of the ES (APP-067)) and provides further clarification on NO₂ emissions to address this matter. It is noted that air quality pollutant thresholds are based upon human health effects.</p> <p>The Councils consider that the characterisation of the baseline environment in terms of human</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>health should take account of the available information on baseline levels of NO₂.</p> <p>The Councils are content that this statement can be agreed, provided health impacts are judged by taking account of potential impacts on NO₂ and appropriate mitigation (the potential impacts of NO₂ were not addressed in the ES Human Health Chapter but control of NO₂ has been addressed in other submissions from the Applicants).</p>
LA-11.07	Existing Environment	The ES adequately characterises the baseline environment for EMFs in terms of human health.	Agreed	Agreed	Agreed	Agreed	None
LA-11.08	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects on human health and are compliant with regulatory policy and guidelines.	Agreed	Agreed	Agreed	Agreed	Public Health England (PHE) were consulted and agreed that the assessment methodologies were appropriate (see section 27.4.3.4 of Chapter 27 Human Health (APP-075)). A cumulative impact assessment has been undertaken



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							(section 27.4.4 of Chapter 27 Human Health (APP-075)) on the inter-project cumulative effects, again following the method statement agreed with PHE.
LA-11.09	Assessment Methodology	The realistic worst case scenario for one project in terms of the largest development footprint as set out in Table 27.3 Chapter 27 Human Health (APP-075) and utilised in the human health impact assessment is appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>Air Quality – The Councils agree and note that worst case scenario for air quality relates to traffic flows.</p> <p>Noise – The Councils maintain that the impact of the noise from the new National Grid infrastructure should be included within the assessment (see LA-08.07). The Applicants note that noise emissions from National Grid substation were considered within the Noise Modelling Clarification Note submitted at Deadline 4 (REP4-043).</p> <p>The Councils consider that the noise assessment does not include the National Grid infrastructure which could be a contributing noise</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>source and therefore does not represent the worst-case scenario.</p> <p>A longer less intense construction period would be preferable to a shorter intense one, and every effort should be made to minimise the impact of noise and traffic on local residents.</p> <p>The Applicants note that, as per Table 25.2, Chapter 25 of the ES (APP-073), the equipment required at the National Grid substation for operation does not include components which would contribute any significant noise contributions within the area. This matter remains not agreed (see LA-08.07), despite the Applicants providing further information on National Grid operational noise levels within the Noise Modelling Clarification Note submitted at Deadline 4 (REP4-043).</p> <p>EMFs – The Councils agree.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-11.10	Assessment Conclusions	Recognising that an assessment of decommissioning will be undertaken closer to that time (as secured by Requirement 30 of the draft DCO (document reference 3.1)), the assessment of impacts for construction and operation presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	The Councils acknowledge that the potential impacts of decommissioning are likely to be different from construction phase impacts, although an accurate assessment may not be possible until closer to such time. The Councils are satisfied that, on the basis that an assessment of potential impacts associated with decommissioning activities is secured through Requirement 30 of the draft DCO (document reference 3.1), the assessment of impacts presented within Chapter 27 of the ES (APP-075) is consistent with the agreed methodologies.
LA-11.11	Assessment Conclusions	The assessment of impacts for construction, maintenance and decommissioning noise effects on terrestrial environments in terms of human health presented for one project are appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	Refer to LA-09.09.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-11.12	Assessment Conclusions	The assessment of impacts for operational noise and vibration effects on terrestrial environments in terms of human health presented for one project are appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	Refer to LA-08.10.
LA-11.13	Assessment Conclusions	The assessment of impacts for air quality during construction and impact on the AQMA in terms of human health presented for one project are appropriate.	Agreed	Agreed	Agreed	Agreed	Refer to LA-04.22.
LA-11.14	Assessment Conclusions	The assessment of impacts for EMFs in terms of human health presented for one project are appropriate.	Agreed	Agreed	Agreed	Agreed	None
LA-11.15	Assessment Conclusions	The assessment of socio-economic impacts in terms of human health presented within the assessment are appropriate.	Agreed	Agreed	Agreed	Agreed	Refer to LA-16.05 and LA-16.06.
LA-11.16	Assessment Conclusions	The assessment of recreation (i.e. use of physical environment) impacts in terms of human health	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		presented within the assessment are appropriate.					
LA-11.17	Assessment Conclusions	The assessment of cumulative impacts between East Anglia ONE North and East Anglia TWO are appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>Table 27.48 of Chapter 27 Human Health (APP-075) considers the location of groups susceptible to intra-project cumulative effects. The Councils consider that this table should also include locations close to transportation routes (e.g. in Stratford St Andrew AQMA). The Councils also believe that this table should include consideration of an additional population group: home workers. Home working will be more common post-Covid and this group will be sensitive to excess noise.</p> <p>Whilst it is noted Covid has likely increased home-working temporarily, the Applicants consider that any permanent impacts of this are unknown.</p> <p>Noise – the Councils do not agree with the conclusions of the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>construction or operational noise assessment, as per the notes at LA-08.10 and LA-09.09.</p> <p>EMFs – the Councils agree the cumulative assessment in relation to the EMF effects is appropriate.</p>
LA-11.18	Assessment Conclusions	The assessment of cumulative impacts with future projects are appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>Air Quality - Section 27.7.3.1.1.2 of Chapter 27 Human Health (APP-075) considers cumulative air quality impacts with Sizewell B decommissioning and Sizewell C construction, and concludes: “Cumulative road traffic emission impacts were not predicted to be significant for human receptors when considered qualitatively alongside Sizewell C New Nuclear Power Station.” The Councils consider that there is no quantitative assessment of cumulative health impacts. Yet the conclusion is drawn that cumulative impacts would not be significant.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>This requires proper evaluation and explanation of the evidence used to reach this conclusion.</p> <p>The Applicants have since submitted a <i>Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)</i> to the Examinations at Deadline 2 (REP2-009). This note provides consideration of potential air quality impacts associated with cumulative traffic and transport impacts, concluding that predicted cumulative pollutant concentrations are all sufficiently below the relevant national air quality objectives and significant impacts are therefore unlikely.</p> <p>Air Quality – the Applicants and the Councils have discussed the assessment and mitigation of potential air quality and associated health impacts of the projects with the proposed SZC project. The Councils understand that an</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>updated Outline CTMP will be submitted at Deadline 8 which will provide acceptable measures to mitigate the potential in-combination impacts through specifying a minimum proportion of HGVs with the latest Euro VI emissions standards, monitoring arrangements for HGVs, and the controls that will be applied to vehicles not complying with Euro VI standards. On this basis, the Councils agree with this comment in relation to air quality.</p> <p>Noise - the Councils agree with the construction and operational noise assessment conclusions with Sizewell C (see LA-08.12 and LA-09.13).</p> <p>The Councils however request that the Applicants reconsider the projects included within the CIA to consider potential new projects</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>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-11.19	Mitigation	The embedded mitigation set out within Section 27.3.4 and Section 27.3.5 of the Environmental Statement is appropriate and sufficient in terms of human health.	Agreed	Agreed	Agreed	Agreed	<p>Air Quality – The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009). The Councils understand that an updated Outline CTMP will be submitted at Deadline 8 which will provide acceptable measures to mitigate the potential in-combination impacts through specifying a minimum proportion of</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>HGVs with the latest Euro VI emissions standards, monitoring arrangements for HGVs, and the controls that will be applied to vehicles not complying with Euro VI standards. On this basis, the Councils agree with this comment in relation to air quality.</p> <p>Noise – The Councils agree with this statement in relation to construction and operational noise see LA-08.14 and LA-09.15.</p> <p>EMF – The Councils consider the embedded EMF mitigation is acceptable.</p> <p>The Councils note the following:</p> <ul style="list-style-type: none"> • Table 27.4 of Chapter 27 Human Health (APP-075): Construction: specifies that best practice and techniques have been used to avoid or reduce impacts on health.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<ul style="list-style-type: none"> • Table 27.4 'Perception of risk' outlines the iterative process in collecting community feedback on perception of risk. It does not however specify how the feedback has informed the design development and the extent to which concerns may have been addressed, and if not transparent this may lead to continued concerns around risk. • Section 27.3.5: post-consent design and monitoring will need to take into account the cumulative impact of neighbouring projects. • Every effort should be made to minimise disruption to public rights of way, and it would be helpful if an assessment was undertaken into the volume of people using the existing PRoW. This would help



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>ensure any necessary short-term disruption to access would affect the minimum number of people. It would be helpful to see a commitment to increasing connectivity for local residents and the opening of alternative routes before any temporary or permanent closure of existing ones.</p> <p>Article 11, Part 3 of the <i>draft DCO</i> (document reference 3.1) stipulates that the PRow specified within Schedule 3 must not be stopped up unless the alternative public right of way specified within Schedule 3 have first been provided to the standard defined within the final PRow Strategy, which in turn must be approved by the relevant planning authority prior to the commencement of the authorised development.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							The Applicants note that PRoW diversions are in themselves mitigation measures to address potential impacts identified upon PRoW (i.e. Temporary or permanent stopping up). PRoW diversions are set out within the Temporary Stopping up of PRoW Plan (REP3-008) and the Permanent Stopping up of PRoW Plan (REP3-009), which should be read in conjunction with Schedule 3 of the draft DCO (document reference 3.1).
Draft Development Consent Order (DCO)							
LA-11.20	Wording of Requirement(s)	The wording of Requirement 22 provided within the draft DCO (document reference 3.1) (and supporting certified documents) with reference to development of a Code of Construction Practice for the mitigation and monitoring of	Agreed	Agreed	Agreed	Agreed	Air Quality – The Applicants confirm that a commitment to 70% Euro VI HGVs where the construction of the Projects overlaps with the construction of Sizewell C was made at Deadline 6 (REP6-003 and REP6-009). The Councils understand that an updated Outline



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		potential impacts on human health is appropriate and adequate.					<p>CTMP will be submitted at Deadline 8 which will provide acceptable measures to mitigate the potential in-combination impacts through specifying a minimum proportion of HGVs with the latest Euro VI emissions standards, monitoring arrangements for HGVs, and the controls that will be applied to vehicles not complying with Euro VI standards. On this basis, the Councils agree with this comment in relation to air quality.</p> <p>Noise – the Councils agree see LA-09.16.</p>
LA-11.21	Wording of Requirement(s)	Requirement 27 of the draft DCO (document reference 3.1) (and supporting certified documents) for the mitigation of operational impacts with respect to noise and vibration of one project alone and cumulative operational impacts respectively, are considered appropriate and proportionate.	Agreed	Agreed	Agreed	Agreed	Refer to LA.08.15.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-11.22	Wording of Requirement(s)	Requirement 25 of the <i>draft DCO</i> (document reference 3.1) (and supporting certified document) for the control of artificial light emissions during the operation of Work Nos. 30, 41 and 38 and with reference to an operational artificial light emissions management plan is considered appropriate and proportionate.	Agreed	Agreed	Agreed	Agreed	None
Other Matters as Required							
N/A							None



2.11 Offshore Seascape, Landscape and Visual Amenity

47. 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.
48. **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
Pre-Application		
26 th June 2017	Meeting	Worst case scenario definition
7 th July 2017	Meeting	Assessment study area and viewpoint locations
27 th April 2018	Meeting	Method statement, assessment methodology and study area
24 th January 2019	Meeting	Presentation and discussion of assessment within PEIR
23 rd May 2019	Meeting	Presentation and discussion of updated design decisions regarding orientation and extent of the East Anglia TWO turbine array
Post-Application		
27 th February 2020	Meeting	SoCG Meeting 1
31 st July 2020	Meeting	SoCG Meeting 2

49. **Table 25** presents the matters agreed or not agreed between the Applicants and the Councils in relation to seascape, landscape and visual amenity.
50. Where the Councils have deferred to Natural England for further justification of their position on certain statements in relation to seascape, landscape and visual amenity matters, it should be noted that Natural England's latest position and rationale are set out within their following submissions:
- Appendix E3b – Natural England Comments on AONB (REP6-114);



- Appendix K5 – Natural England’s Issue Specific Hearing 8 Seascape and Landscape Visual Amenity (SLVIA) Oral Representation Summary Advice (REP6-118);
- Appendix I1e – Risk and Issues Log (REP6-119); and
- Appendix E3 – Comments to Effects with Regard to SCHAONB and Accordance with NPS Policy (REP3-120).

**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
Environmental Impact Assessment							
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>The notes at LA-12.01 are also relevant to this statement.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-12.04	Assessment Methodology	With the exception of Viewpoint 10 (Sizewell Beach) and Suffolk Coastal 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 Coastal Path (Section 7), is accurately described within the ES.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils do not agree with the following judgements made by the Applicants:</p> <ul style="list-style-type: none"> • 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; • 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 • That the overall sensitivity to change comes out as Medium for this Area of Outstanding Natural Beauty (AONB) sea view with the power stations behind the viewer, the Councils consider this should be high.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The Councils defer to Natural England's position on this matter.
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 Table 28.2, Chapter 28 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 draft DCO (document reference 3.1) as part of the Deemed Marine Licence (DML).
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	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		suitable to inform judgements on the visual effect of the offshore infrastructure, while recognising that all photomontages have limitations as set out in section 6.3.28.2, Appendix 28.2 of ES (APP-557).					
LA-12.10	Assessment Conclusions	The conclusions of the assessment of effects for construction, operation and decommissioning presented within Chapter 28 of the ES (APP-076) are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	Agreed	None
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	Not Agreed	The Councils defer to the expertise of Natural England on matters relating to receptor sensitivity and AONB special qualities.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
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	Not Agreed	The sensitivity of the receiving environment in the area around Sizewell Nuclear Power Stations is not agreed (refer to LA-12.05). The Councils defer to 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	Not Agreed	The Councils' position is that effects on the Special Qualities of the AONB have not been accurately assessed. The Applicants consider that an accurate assessment of effects upon the AONB special qualities has been undertaken as part of the SLVIA assessment presented within Chapter 28 of the ES (APP-076).
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	Not Applicable	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		effects on natural beauty / special qualities of the AONB.					
LA-12.16	Assessment Conclusions	The Suffolk Heritage Coast (shown on Figure 28.13 (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 Coast are unlikely to experience significant effects.	Agreed	Not Applicable	Agreed	Agreed	None
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	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
		the AONB, approximately between Covehithe in the north and Aldeburgh / Orford Ness in the south.					
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
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	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
		the character and distinctiveness of the AONB.					
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	Not Agreed	<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).</p> <p>The effects on the Special Qualities of the AONB are not considered to have been accurately assessed (see LA-12.13).</p> <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 Section 4.18, Volume 3 of the Applicant's Comments on Relevant Representations (AS-036) (ID 3.9.2).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
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	Not Agreed	<p>The Councils request that the Applicants provide an update to their CIA to take into consideration the Sizewell C DCO submission material.</p> <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 a 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 Section 28.3.3 and monitoring set out within Section 28.3.4 of the East Anglia ONE North ES (APP-076) is appropriate and sufficient.	Not Applicable	Agreed	Not Agreed	Not Agreed	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



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							effectiveness of mitigation to inform the design of future Projects. 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 Section 28.3.3 and monitoring set out within Section 28.3.4 of the East Anglia TWO ES (APP-076) is appropriate and sufficient.	Agreed	Not Applicable	Not Agreed	Not Agreed	<p>The Councils support Natural England's view that insufficient embedded mitigation has been included within the design of East Anglia TWO and refer also to the notes at LA-12.22 regarding monitoring.</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 form of reduced lateral spread and avoidance of the 'curtaining' effect with East Anglia ONE North, which occurred with the PEIR layout. The Applicants have also committed to a reduced turbine tip height of 282m (revised</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>down from 300m at the time of submitting the Applications).</p> <p>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 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	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
		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
Draft Development Consent Order							
LA-12.27	Wording of Requirement(s)	The wording of Requirement 2 provided within the draft DCO (document reference 3.1) (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 draft DCO (document reference 3.1) as part of the DML.
LA-12.28	Wording of Requirement(s)	The wording of Requirement 3 provided within the draft DCO (document reference 3.1) (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	<p>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.</p> <p>The Councils will defer to other statutory bodies in relation to the appropriateness of the number and sizes of the offshore structures.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-12.29	Wording of Requirement(s)	The wording of Requirement 31 provided within the draft DCO (document reference 3.1) with reference to aviation lighting is appropriate and sufficient to secure the operation of aviation lighting at the lowest permissible level.	Agreed	Agreed	Agreed	Agreed	In light of the Ministry of Defence confirming their position in respect of Requirement 31 (REP6-106), this matter is now agreed.
LA-12.30	Wording of DMLs	The wording of article 3, Schedule 13 Part 1 of the draft DCO (document reference 3.1) with reference to the maximum number of wind turbine generators is appropriate.	Agreed	Agreed	Agreed	Agreed	None
Other Matters as Required							
N/A							



2.12 Landscape and Visual

51. The onshore components of the Projects 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.
52. **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
Pre-Application		
27 th April 2018	Meeting	Method statement, assessment methodology and study area
24 th January 2019	Meeting	Presentation and discussion of assessment within PEIR
23 rd May 2019	Meeting	Confirmation of assessment methodology and approach to mitigation for the ES
Post-Application		
27 th February 2020	Meeting	SoCG Meeting 1
31 st July 2020	Meeting	SoCG Meeting 2
7 th October 2020	Meeting	SoCG workshop
16 th March 2021	Meeting	SoCG Meeting 3

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
Environmental Impact Assessment							
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	Not Agreed	<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 as set out in the Joint Local Impact Report (REP1-132) and the Councils Deadline 2 submission (REP2-029).</p> <p>The Applicants consider that the ES (Section 29.5.2, Chapter 29 and Appendix 29.3, Section 29.3.1) (APP-077) appropriately characterised the baseline environment in terms of landscape character. The Applicants have submitted an Archaeology and Cultural Heritage Clarification Note (REP1-021), which provides further consideration of historic characteristics of the landscape.</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 LVIA (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	Not Agreed	<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 as set out in the Joint Local Impact Report (REP1-132) and the Councils Deadline 2 submission (REP2-029).</p> <p>The Applicants consider that the ES (Section 29.5.2, Chapter 29 and Appendix 29.3, Section 29.3.1) (APP-077) appropriately characterised the baseline environment in terms of landscape character. The Applicants have submitted an Archaeology and Cultural Heritage Clarification Note (REP1-021) which provides further consideration of historic characteristics of the landscape.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-13.08	Assessment Methodology	Notwithstanding the Councils position on growth rates and early planting, the 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 section 6.3.29.2, Appendix 29.2 to the ES (APP-566).	Agreed	Agreed	Agreed	Agreed	The Councils consider that the updated photomontages provide a more realistic representation of the planting proposed by the Applicants, however, the Councils' position is that the growth rates proposed by the Applicants are optimistic.
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	Agreed	Agreed	The Councils agree to this statement subject to effective and robust implementation of the adaptive management scheme as set out in the OLEMS (document reference 8.7), which would reduce the risk of failure of planting.
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 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 Figure 6.2a (APP-097).	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-13.14	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	Agreed	Agreed	Refer to LA-13.11.
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	Agreed	Agreed	Refer to LA-13.11.
LA-13.17	Assessment Conclusions	The cumulative effects with future projects have been	Agreed	Agreed	Not Agreed	Not Agreed	The Councils request that the Applicants reconsider the projects included within the CIA



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		adequately and appropriately described within the LVIA and the conclusions are appropriate.					<p>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-13.18	Mitigation	The embedded mitigation set out within section 29.3.3 and monitoring set out within section 29.3.4 of the ES (APP-077) and illustrated in the Outline Landscape Mitigation Plan (shown on Figures 29.11a-b and 29.12 (APP-401 to APP-403) is appropriate and sufficient.	Agreed	Agreed	Not Agreed	Not Agreed	<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 Substations Design Principles Statement (REP4-029) to make all reasonable effort to reduce the size and scale of the substations at the detailed design stage.</p> <p>In line with their submission at Deadline 6 (REP6-077), the Councils also request an additional design principle to ensure the design will have regard to opportunities arising from emerging new technologies and changes to legislation and regulations.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							The Applicants note that the DCO would authorise the Projects within specified maximum parameters, although it is noted that the Substations Design Principles Statement (REP4-029) provides 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.
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	Agreed	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		phases of the Projects constructed simultaneously (Scenario 1).					
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	Agreed	Agreed	The Councils welcome the commitment to installing the ducting for the second project in parallel with the installation of the onshore cables for the first project should both Projects be consented and then built sequentially. This is secured by Requirement 42 of the draft DCO (document reference 3.1).
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 OLEMS (document reference 8.7) and secured through the draft DCO (document reference 3.1) (Requirement 14 and Requirement 15) is appropriate.	Agreed	Agreed	Agreed	Agreed	<p>The Councils understand that pre-construction surveys will be secured through and subject to landowner agreements, but that the Applicants will advise the Councils prior to the undertaking of any such surveys as specified within the Land Use Clarification Note (REP1-022).</p> <p>The Councils do however note and welcome the amendment to Requirement 26 of the draft DCO (document reference 3.1) which ensures that onshore preparation works management plans will be prepared for the onshore preparation works.</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	The Councils agree this statement subject to the avoidance of unnecessary tree removal and excessive hedge removal. 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.
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	Not Agreed	Please refer to the notes at LA-13.18.
LA-13.25	Mitigation	The tree species for woodland and hedgerow planting set out in the OLEMS (document reference 8.7) are suitable for the proposed mitigation planting.	Agreed	Agreed	Agreed	Agreed	None
LA-13.26	Mitigation	The proposed mitigation planting within the OLEMS (document reference 8.7) is based on appropriate and	Agreed	Agreed	Agreed	Agreed	Please refer to the notes at LA-13.11. The Councils agree this statement in relation to



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		realistic growth rates, as presented within Chapter 29 Landscape and Visual Impact Assessment of the ES (APP-077).					Work No.s 19, 24 and 33 which are subject to adaptive management measures.
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	Not Agreed	<p>The Councils requested clarification regarding the effects on reinstatement, mitigation, and early planting as a result of sequential construction.</p> <p>Whilst the Applicants have made a commitment to installing the ducting for the second project in parallel with the installation of the onshore cables for the first project should both Projects be consented and then built sequentially, they are not able to confirm at this stage the sequencing of the projects (i.e. which project will be constructed first). The Applicants have submitted an updated OLEMS (document reference 8.7) which provides further details of early planting.</p>
Draft Development Consent Order							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-13.28	Wording of Requirement(s)	The wording of Requirement 14 provided within the draft DCO (document reference 3.1) (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	Agreed	Agreed	None
LA-13.29	Wording of Requirement(s)	The wording of Requirement 15 provided within the draft DCO (document reference 3.1) (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	<p>The Councils have requested Work No. 29 to be included within the 10-year management period and secured through Requirement 15 of the draft DCO (document reference 3.1).</p> <p>The Applicants will include Work No. 29 within the scope of 10-year replacement period, but note that the 10-year replacement period only applies to trees or shrubs (if any) planted within this Work No.</p>
LA-13.30	Wording of Requirements	The wording of Requirement 12 provided within the draft	Agreed	Agreed	Agreed	Agreed	Please refer to the notes at LA-13.18.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
		DCO (document reference 3.1) with reference to onshore detailed design parameters is appropriate and sufficient.					
Other Matters as Required							
LA-13.31	Wording of OLEMS (document reference 8.7)	The wording contained within the OLEMS (document reference 8.7) is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	<p>The Councils have requested Work No. 29 to be included within the 10-year management period and secured through the OLEMS.</p> <p>The Applicants will include Work No. 29 within the scope of 10-year replacement period, but note that the 10-year replacement period only applies to trees or shrubs (if any) planted within this Work No. This commitment is reflected within the OLEMS (document reference 8.7) and draft DCO (document reference 3.1) submitted at Deadline 8.</p>
LA-13.32	Long Term Management of Site	The Councils request that a long-term management plan for the maintenance of woodland planting be provided in relation to the Grove Wood, Friston substation site.	Agreed	Agreed	Agreed	Agreed	<p>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 have updated the OLEMS (document reference 8.7) with details of outline management arrangements and longer-term maintenance of the mitigation</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							planting during the operational phase of the Projects.
LA-13.33	Long Term Management of Site	The Councils request that a Community Liaison Group be established in relation to the Grove Wood, Friston substation site.	Not Agreed	Not Agreed	Agreed	Agreed	<p>The Councils 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. However, the Applicants are committed to ensuring means of communication between the Projects 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

53. 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.
54. **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
Pre-Application		
12 th June 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
24 th January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
Post-Application		
4 th August 2020	Meeting	SoCG Meeting 1
10 th February 2021	Meeting	SoCG Meeting 2

55. **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
Environmental Impact Assessment							
LA-14.01	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils requested on the 12th 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 Chapter 30 Tourism, Recreation and Socio-Economics (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 Consultation Report, Table 4.7 (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 Socio-Economics and Tourism Clarification Note detailing any changes in assumptions within the Projects' Applications since acceptance of the Sizewell C DCO application at Deadline 1 (REP1-036).</p> <p>The Applicants and Councils position on PRoW are provided in Table 31 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	Not Agreed	<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 Socio-Economics and Tourism Clarification Note submitted to the Examination at Deadline 1 (REP1-036).
LA-14.06	Assessment Methodology	The worst case scenario (section 30.3.2 of Chapter 30 Tourism, Recreation and Socio-Economics) (APP-078) in terms of construction working hours, peak personnel numbers and construction programme (Table 30.2) 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	Not Agreed	<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"> 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 Chapter 26 - Traffic and Transport (APP-074). No significant adverse effects are predicted after mitigation described in the inter-related chapters (i.e. Chapter 19 Air Quality (APP-067), Chapter 20 Water Resources and Flood Risk (APP068), Chapter 25 Noise and Vibration (APP-073) Chapter 26 Traffic and Transport (APP-074)). 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.



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	Not Agreed	<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 (Table 30.85 of Chapter 30 Tourism, Recreation and Socio-Economics, (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	Not Agreed	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 (Table 30.85 of Chapter 30 Tourism, Recreation and Socio-Economics (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	Not Agreed	<p>The Applicants have submitted a Socio-Economics and Tourism Clarification Note comparing the assumptions used for Sizewell C contained within the Projects' Applications, with the now published Sizewell C material at Deadline 1 (REP1-036). The Councils are content with the conclusions of the clarification note with respect to accommodation.</p> <p>The Councils consider that Local DMO evidence from the 2019 visitor and business survey 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</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							<p>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 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</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							recognised by the provision of the mitigation package proposed for the Sizewell C project.
LA-14.11	Assessment Conclusions	The assessment of cumulative impacts with proposed future projects is acceptable.	Agreed	Agreed	Not Agreed	Not Agreed	<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 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>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
							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.
LA-14.12	Mitigation	The proposed enhancements, mitigation and monitoring set out within Section 30.3.3 and Section 30.3.4 of the ES (APP-078) is appropriate and sufficient.	Agreed	Agreed	Not Agreed	Not Agreed	<p>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 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 consider that with the exception of highly localised significant visual impacts around the onshore substations at Grove Wood, the impacts for the above EIA topics are not significant. Notwithstanding this position, the Applicants have agreed to provide a Tourism Fund.</p>
Draft Development Consent Order							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-14.13	N/A	N/A	N/A	N/A	N/A	N/A	None
Other Matters as Required							
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.	Agreed	Agreed	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> <p>Notwithstanding this position, the Applicants have committed to a Tourism Fund.</p>



2.13.2 Recreation (Public Rights of Way)

56. 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.
57. **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
Pre-Application		
12 th June 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
24 th January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
Post-Application		
18 th March 2020	Meeting	SoCG Meeting 1
14 th July 2020	Meeting	SoCG Meeting 2
28 th September 2020	Meeting	SoCG Meeting 3
16 th March 2021	Meeting	SoCG Meeting 4

58. **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
Environmental Impact Assessment							
LA-15.01	Existing Environment	Sufficient desk-based data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	Not Agreed	<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 Applicants note that the existing value and character of the landscape is considered in section 29.5.2 (APP-077) and PRoWs where receptors may experience a loss in visual amenity are identified in section 29.5.4.2.</p> <p>The Applicants further note that those PRoWs that are listed in Chapter 30 Tourism, Recreation and Socio-Economics (APP-078) as potentially affected are those that fall within the Order limits. Schedule 3 and Schedule 4 of the draft DCO (document reference 3.1) 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	Agreed	Agreed	Not Agreed	Not Agreed	The Councils consider that access and amenity should be assessed as a subject in



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		EIA provide an appropriate approach to assessing potential impacts of the Projects.					<p>its own right rather than divided across different ES chapters and consider that a single assessment should include both an 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</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>PRoW; they use the interconnected network.</p> <p>The Applicants note that the impact assessments with regards to PRoW have followed a conventional 'source-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 submitted a Public Rights of Way Clarification Note (REP1-049) 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.</p>
LA-15.03	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Not Agreed	Not Agreed	<p>The Councils are understanding of the principles set out within the Outline PRoW Strategy (REP3-024), but maintain that they cannot reach an informed view about the worst case scenario as there is insufficient information provided by the Applicants as to the duration and timing of</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>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 temporary PRoW closures as this can only be established at the detail design stage, and note that the Outline PRoW Strategy (REP3-024) states that “Typically, PRoW along the onshore 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).”</p> <p>The Applicants also note that prior to undertaking works that would affect a PRoW listed in Schedule 3 or Schedule 4 of the draft DCO (document reference 3.1) the relevant highway authority must have approved the PRoW Strategy. This is secured under Requirement 32 of the draft DCO (document reference 3.1).</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
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	Not Agreed	<p>The Councils consider that the conclusions are consistent with the methodologies used but the Councils consider 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 (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 Chapter 29 Landscape and Visual Impact Assessment (APP-077), specifically section 29.6.1.3.1 and section 29.6.2.2.1 (APP-077) and with further clarification provided within the Public Rights of Way Clarification Note submitted at Deadline 1 (REP1-049).</p>
LA-15.05	Assessment Conclusions	The impact assessment conclusions for construction,	Agreed	Agreed	Agreed	Agreed	The Councils accept that the conclusions are reasonable for most of the temporary



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		operation and decommissioning (associated with the temporary closures of PRow along the onshore cable corridor) presented are acceptable.					<p>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 Highway Authority under Requirement 32 of the <i>draft DCO</i> (document reference 3.1).</p> <p>Following discussions with the Councils, the Applicants have amended the interface between the permanent PRow diversion, Grove Road and the onshore cable route.</p>
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	Not Agreed	<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>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<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.</p> <p>The Councils consider that 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 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 of the view that the amenity value of the permanent PRoW diversion at the onshore substation location</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>will be increased by the long-term establishment of the proposed landscaping set out within the OLEMS (document reference 8.7).</p> <p>The Applicants do not agree that the conclusions are inconsistent given they consider that the assessment of landscape and visual impacts is separate to the assessment of recreational and/or amenity value provided by PRow. The Applicants note that as the ES follows the source-pathway-receptor model, it has therefore assessed impacts on users of PRow (i.e. users of the PRow are the receptors as opposed to the PRow itself).</p> <p>The Applicants submitted the Changes to Mitigation Measures Tracking List at Deadline 7 (REP7-040) which makes reference to the commitments to establish PRow diversions in accordance with the Outline PRow Strategy (REP3-024).</p>
LA-15.07	Assessment Conclusions	The assessment of cumulative impacts between East Anglia	Agreed	Agreed	Not Agreed	Not Agreed	Please refer to the notes at LA-15.02 and LA-15.04.



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		TWO and East Anglia ONE North are acceptable.					
LA-15.08	Assessment Conclusions	The assessment of cumulative impacts with the proposed Sizewell C is acceptable.	Agreed	Agreed	Agreed	Agreed	The conclusions are accepted notwithstanding the comments made in LA-15.02 and LA-15.04.
LA-15.09	Assessment Conclusions	The assessment of cumulative impacts with proposed future projects is acceptable.	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-15.10	Mitigation	The embedded mitigation set out within Section 30.3.3 and Section 30.3.4 of the ES	Agreed	Agreed	Agreed	Agreed	The Councils broadly accept the principles in the Outline PRow Strategy (REP3-024) for the management of the temporary closures for taking forward to the detailed



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		(APP-078) is appropriate in terms of PRow.					<p>PRow strategy as per Requirement 32 of the draft DCO (document reference 3.1).</p> <p>Whilst the Councils accept that the individual measures are appropriate in themselves, taken together they are not sufficient to adequately mitigate the impacts that are caused by the development, in particular at the substation site.</p> <p>The Councils would have expected to see additional mitigation particularly at the substation site, including measures such as physical improvements to the off site PRow infrastructure, additions or revisions to the PRow network around Friston, and the provision of public open space.</p>
LA-15.11	Mitigation	<p>The new measures adopted relating to:</p> <ul style="list-style-type: none"> Amended connectivity at High House Farm and Laurel Covert; Diversion of PRow away from the sealing end compound; 	Agreed	Agreed	Agreed	Agreed	<p>The Applicants confirm that the permanent PRow diversion will not be within the public highway, but along the field margin running parallel to Grove Road.</p>



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		<ul style="list-style-type: none"> Offsetting of the PRow diversion from Grove Road; and Additional landscaping within the vicinity of permanent PRow diversions; <p>are positive changes to the Outline PRow Strategy (REP3-024).</p>					
Draft Development Consent Order							
LA-15.12	Wording of Requirement(s)	The wording of Requirement 26 provided within the draft DCO (document reference 3.1) with reference to onshore preparation works management plans ensures that PRowWs are managed in a safe and appropriate manner during the onshore preparation works.	Agreed	Agreed	Agreed	Agreed	The Councils note that the matters to be addressed within the onshore preparation works management plans are set out within Appendix 1 of the Outline CoCP (document reference 8.1).



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-15.13	Wording of Requirement(s)	The wording of Requirement 32 provided within the draft DCO (document reference 3.1) (and supporting certified documents) with reference to development of a PRoW Strategy ensure that PRoWs are managed in a safe and appropriate manner during the Projects' construction and operational phases.	Agreed	Agreed	Agreed	Not agreed	SCC understands from dialogue with the Applicants that Requirement 32 is to be revised at Deadline 8 to ensure that it applies to the onshore preparation works as well as to the authorised development. SCC would welcome this proposed change.
LA-15.14	Schedule 4: Footpaths to be Stopped up	The alternative footpaths described in Schedule 4 (footpaths to be stopped up) of the draft DCO (document reference 3.1) are appropriate.	Agreed	Agreed	Agreed	Agreed	The Councils request that the final PRoW Strategy should provide detailed descriptions of alternative footpaths to reflect a standard SCC format.
Other Matters as Required							
LA-15.15	Funding for inspections	The Applicants will provide reasonable funding for SCC (under a Planning Performance Agreement or similar) for the certification of	Agreed	Agreed	N/A	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited / Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		new PRoW routes, inspection of alternative rights of way and of the PRoW when reinstated.					
LA-15.16	Code of Construction Practice	The wording of Requirement 22 provided within the draft DCO (document reference 3.1) (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	None
LA-15.17	Fencing and other means of enclosure	The wording of Requirement 17 provided within the draft DCO (document reference 3.1) (and supporting certified documents) with reference to fencing and other means of enclosure is appropriate and adequate.	Agreed	Agreed	Agreed	Agreed	The Applicants will ensure that the final PRoW Strategy (secured under Requirement 32 of the draft DCO (document reference 3.1)) includes details of any fencing associated with existing PRoWs, new PRoW diversions or temporary PRoW diversions for approval.



2.13.3 Socio-Economics

59. 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.
60. **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
Pre-Application		
12 th June 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.)
24 th January 2019	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR
Post-Application		
16 th April 2020	Meeting	SoCG Meeting 1
19 th June 2020	Written Correspondence	Councils provided comments on the SoCG by e-mail
12 th February 2021	Meeting	SoCG Meeting 2

61. **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
Environmental Impact Assessment							
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 section 30.3.3.1 of Chapter 30 (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 Table 30.2 of Chapter 30 (APP-078) for one project alone, for the following parameters presented in the assessment are appropriate:</p> <ul style="list-style-type: none"> Construction Phase (Onshore): <ul style="list-style-type: none"> size of the employment opportunity; 	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"> – duration of construction phase; – residual magnitude of determinants; and – travel to work times. • Construction Phase (Offshore): <ul style="list-style-type: none"> – size of the employment opportunity; and – duration of construction phase. • Operational Phase (Onshore): <ul style="list-style-type: none"> – size of employment opportunity; and – duration of operation phase. • Operational Phase (Offshore): <ul style="list-style-type: none"> – location of offshore windfarm. 					
LA-16.05	Assessment Conclusions	The conclusions of the project alone impact assessment set out in Table 30.98, Chapter 30 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"> Construction in relation to Impact 1a - onshore construction employment and Impact 1b – offshore construction employment; Operation in relation to Impact 1 – long term employment; and Decommissioning. 					
LA-16.06	Assessment Conclusions	<p>The conclusions of the CIA between the Projects as set out in Table 30.98, Chapter 30 (APP-078) are acceptable for the following aspects:</p> <ul style="list-style-type: none"> 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 Cumulative operation impacts with East Anglia ONE North and East Anglia TWO together in relation to Impact 1 – long term employment. 	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 Table 30.98, Chapter 30 (APP-078) are acceptable for the following aspects of the Projects:</p> <ul style="list-style-type: none"> Cumulative construction impacts with other developments in relation to Impact 1a Onshore construction employment and Impact 1b – Offshore construction employment; and Cumulative operation impacts with other developments in relation to Impact 1 – Long terms employment. 	Agreed	Agreed	Agreed	Agreed	None
LA-16.08	Mitigation	<p>The proposed enhancements, mitigation and monitoring set out within Section 30.3.3 and Section 30.3.4 of the ES (APP-078) covering skills and training enhancements and supply chain plan are appropriate and sufficient for the purposes of the Application.</p>	Agreed	Agreed	Agreed	Agreed	None
Draft Development Consent Order (DCO)							



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	ESC Position	SCC Position	Notes
LA-16.09	N/A	N/A	N/A	N/A	N/A	N/A	None
Other Matters as Required							
LA-16.10	Employment and Skills MoU	<p>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 Projects in the communities most closely associated.</p> <p>The Employment and Skills MoU is an appropriate mechanism to secure and deliver this commitment.</p>	Agreed	Agreed	Agreed	Agreed	None
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

62. 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**