



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicant's Comments on Relevant Representations Volume 2: Individual Stakeholders

Applicant: East Anglia TWO Limited
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Applicable to East Anglia ONE North and East Anglia TWO



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This document is supported by the following appendices:

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



Glossary of Acronyms

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



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



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



Glossary of Terminology

Applicant	East Anglia TWO Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.



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

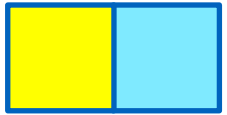


Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore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



1 Introduction

1. The Applicant's comments on Relevant Representations received from Interested Parties (IPs) for East Anglia TWO ('the Project') have been separated into separate Volumes, as discussed in **Volume 1** (document reference ExA.RR1.D0.V1).
2. This Volume presents the Applicant's comments on Relevant Representations received from members of the public / businesses. Relevant Representations received in respect of the East Anglia TWO and East Anglia ONE North projects ('the Projects') from members of the public / businesses have been grouped by topic in order to avoid unnecessary repetition in responses. The key topics raised in these Relevant Representations along with the Applicant's comments have been provided in **Table 1** to **Table 33** below.
3. In accordance with the ExA's procedural decisions on document management of 23rd December 2019, this document is applicable to both the East Anglia ONE North and East Anglia TWO Applications (with the exception of the Glossary of terminology and Introduction and the specific sections listed in **paragraph 5** below). It is therefore largely endorsed with the yellow and blue icon used to identify materially identical documentation. Where a section differs between the two Projects, the coloured box in the headers and the colour of the section headings will reflect this as well as text in the footers.
4. It should be noted that some members of the public / businesses only submitted Relevant Representations for one project, however, to ensure all Relevant Representations were considered by the Applicant these representations have been considered with regard to both Projects.
5. Five topics have comments on Relevant Representations which vary between the Projects and therefore the coloured box in the headers and the colour of the section headings reflects this. These are:
 - Commercial Fisheries (**section 2.2**);
 - General Offshore Comments (**section 2.8**);
 - Policy and Legislation (**section 2.20**);
 - Seascape (**section 2.27**); and
 - Tourism and Hospitality (**section 2.30**).



2 Topic by Topic Comments on Members of the Public / Businesses Relevant Representations

6. Each member of the public / business that has made a Relevant Representation in relation to a particular topic is identified within the tables below using the reference number assigned to that Relevant Representation by the Planning Inspectorate.



2.1 Adequacy of Consultation

Table 1 Applicant's Comments on Adequacy of Consultation

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Consultation undertaken by National Grid	RR-050, RR-154, RR-182, RR-331, RR-445, RR-736, RR-764.	<p>The Applicant notes queries raised in Relevant Representations regarding the consultation undertaken by National Grid.</p> <p>National Grid infrastructure forms part of the Development Consent Order (DCO) application (Chapter 6 Project Description (APP-054)). National Grid is a development partner for the Project and the Applicant has engaged in consultation on behalf of National Grid.</p> <p>The Applicant has also engaged with National Grid Ventures and National Grid Energy Transmission since the Project's inception. Outcomes of this engagement and Project developments have been subsequently communicated to the general public as described in the Consultation Report (APP-029) and in more detail below.</p>
002	Measures taken to engage the general public effectively	RR-023, RR-025, RR-045, RR-050, RR-072, RR-074, RR-143, RR-148, RR-151, RR-154, RR-155, RR-167, RR-182, RR-193, RR-194, RR-208, RR-217, RR-234, RR-282, RR-299, RR-331, RR-367, RR-388, RR-393, RR-445, RR-447, RR-449, RR-465, RR-469, RR-526, RR-589, RR-600, RR-605, RR-620, RR-622, RR-628, RR-630, RR-632, RR-635, RR-646,	<p>Consultation is recognised by the Applicant as being a key feature of the EIA process, and continues throughout the lifecycle of a project, from its initial stages through to consent and post-consent.</p> <p>Consultation has been undertaken through the informal and formal pre-application stages, including the formal submission of the Scoping Report (SPR 2017)¹ in November 2017 and the Preliminary Environmental Information Report (PEIR) in February 2019 (SPR 2019)².</p> <p>The Applicant produced a Statement of Community Consultation (SoCC) in March 2018. The SoCC explained how the Applicant intended to consult with local</p>

¹ ScottishPower Renewables (2017) East Anglia TWO Offshore Windfarm Environmental Impact Assessment Scoping Report.

² ScottishPower Renewables (2017) East Anglia TWO Offshore Windfarm Preliminary Environmental Information Report



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-649, RR-662, RR-671, RR-673, RR-707, RR-720, RR-736, RR-741, RR-761, RR-763, RR-764, RR-787, RR-793, RR-794, RR-809, RR-828, RR-831, RR-841, RR-869, RR-825, RR-834, RR-851, RR-919.	<p>communities on the Project as required under the Planning Act 2008. It detailed the opportunities available for local communities to come and meet the Applicant to ask questions and to comment on the plans for the Project.</p> <p>The SoCC also gave notification of the intention to hold Public Information Days (PIDs) and gave an indication of when these would take place. The Project SoCC (published 6th March 2018) is found in Appendix 3.2 of the Consultation Report (APP-029). The Applicant undertook statutory consultation of the SOCC as described in section 3.4.2 of the Consultation Report. The SoCC was then publicised in local East Anglian newspapers (Eastern Daily Press, East Anglian Daily Times, Ipswich Star and Fishing News) on two separate occasions and dates as set out in section 3.4.3. The SoCC was later updated to introduce Project developments and an additional phase of consultation, Phase 3.5, in order to engage with local communities (section 3.5 of the Consultation Report).</p> <p>A summary of the range of measures adopted during consultation are presented below; agreed through the SoCC (as updated), and summarised in the Consultation Report:</p> <ul style="list-style-type: none"> • PIDs held at locations within and adjacent to the onshore study area). PIDs were held on the following dates: <ul style="list-style-type: none"> ○ Phase 1 held between 30th October and 2nd November 2017 in Southwold, Leiston, Lowestoft and Orford (section 4.3.2.2); ○ Phase 2 held between 17th and 25th March 2018 in Lowestoft, Southwold, Leiston, Thorpeness, Aldeburgh and Orford (section 5.2.2.2) ○ Phase 3 held between 28th June and 28th July in Orford, Friston, Leiston, Southwold, Lowestoft, Aldeburgh and Thorpeness (section 6.2.2.2); and



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> Phase 3.5 held between 9th October 2018 and 15th October 2018 (section 7.2.1.2). <p>Phase 1 informal consultation (October / November 2017) with statutory consultees and the public designed to introduce the Project to local communities and to inform on the approach to Environmental Impact Assessment (EIA), whilst also providing an opportunity for feedback to be provided to the Applicant. At this stage there could be no formal consultation because the onshore infrastructure locations were only indicative areas i.e. 'areas of search' forming the 'Onshore Study Area'. It was communicated that this would be refined and form part of the consultation process;</p> <ul style="list-style-type: none"> Between Phase 1 and Phase 2 the Planning Inspectorate consulted with organisations (including Friston Parish Council) on both the onshore and offshore works for the Project. A formal Scoping Opinion (APP-033) was provided by the Planning Inspectorate in December 2017; Phase 2 formal consultation (March / April 2018) with statutory consultees and the public in order to provide further information on the indicative onshore development area and substation zones for the intended onshore electrical infrastructure and to obtain comments on viewpoints selected to assess the visual impacts of the offshore wind turbines. The Applicant requested to meet with Friston Parish Council in February 2019 and were thereafter given a 20 minute allocation at a Council meeting on 5th March. This was an appropriate time to consult on potential issues as there was sufficient information available at this stage. This was followed up with further consultation at Phase 3 and Phase 3.5 regarding the onshore substation locations; Phase 3 formal consultation (May to August 2018) with statutory consultees and the public in order to show the Indicative Onshore Development Area for onshore infrastructure, including the proposed substation location north of



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Friston (known as Grove Wood) and to update consultees on general proposed development plans;</p> <ul style="list-style-type: none"> Phase 3.5 formal consultation (September to November 2018 and including four community engagement events held in October 2018) with statutory consultees and the public to consult upon an alternative substation location between Leiston and Sizewell known as Broom Covert, as well as the Grove Wood site at Friston. The alternative substation location would make use of land which is part of mitigation measures for the proposed Sizewell C power station. The Applicant therefore also consulted on alternative mitigation land areas which could be used for the Sizewell C development. Consultation was also undertaken with communities where traffic and transport modifications may be required. Options to ensure appropriate connection to the surface water drainage network were also consulted on; Phase 4 formal consultation (February / March 2019) with statutory consultees and the public (including publication of the PEIR and Section 42 consultation with statutory consultees) in order to consult upon the PEIR for the Project. This included details of the preliminary environmental assessment findings, a description of the proposals and baseline environmental information collected (to date). The PEIR identified the potential impacts of the Project including cumulative impacts as relevant, and where necessary has identified possible mitigation measures to reduce, prevent or offset these. The PEIR was consulted upon directly with statutory consultees and prescribed consultation bodies, Local Planning Authorities and persons with an interest in the land. The Applicant also consulted with local communities, the wider public and other organisations on the PEIR;



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> • PID summary reports shared with all registered participants, key local and community stakeholders, and on the Project website for Phase 2, Phase 3 and Phase 4 community engagement events; • Parish Council briefings; • Direct discussions with landowners; • The Applicant and the Applicant's land agents have met affected landowners and / or their appointed land agents. A number of preferences for the routing of the onshore cable route have been put forward by those affected by the proposed onshore development area and a number of those suggestions have been incorporated into the proposed onshore development area boundary; • The Applicant has engaged with landowners regarding survey access through consultation meetings. Letters were sent to all affected parties offering to meet to discuss the Project proposals; • Bi-annual newsletters distributed throughout the onshore substation(s) site selection study area once the area had been defined. The Autumn/Winter 2017/18 newsletter was distributed prior to Phase 1 consultation when the onshore study area was east of the Aldeburgh Road but the Summer 2018 issue was distributed to the wider onshore development area and all copies after that (once the study area was extended west to avoid the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)). This lag in distribution is noted by the Applicant however the extent of coverage is dependent on Project developments and meaningful Project information as and when it becomes available; • Provision of a dedicated website for the Project; and



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> Regular and targeted discussion with regulators and other stakeholder bodies through various means including Expert Topic Group (ETG) meetings (Groups comprising experts on a particular topic, formed to discuss details of data requirements, and which report to the Steering Group); and Dedicated Project e-mail address and freepost address to assist local communities in contacting the Applicant.
003	Key announcements and timings	RR-025, RR-217, RR-388, RR-393 RR-649, RR-764.	<p>The Applicant notes comments within Relevant Representations regarding the timing of key Project announcements.</p> <p>Plate 2.1 in the Consultation Report (APP-029) provides a visual representation of the pre-application consultation timeline. Section 2.8 summarises the key stages of consultation from pre-application Phase 1 through to Phase 4.</p> <p>Section 4.3 summarises non-statutory community consultation undertaken by the Applicant during pre-application Phase 1. The Applicant initiated PIDs across four separate venues in October and November 2017 (Table 4.3). These PIDs were advertised on quarter page adverts in local newspapers as described in section 4.3.2.3. There were several meetings with parish and town council members in order to provide information on the Project and to answer questions. Meetings were held with Aldringham-cum-Thorpe, Knodishall and Southwold Parish Councils on 27th November 2017, 9th January 2018 and 18th January 2018 respectively. Consultation materials and feedback forms were also utilised during and after the PIDs.</p> <p>A similar process was then repeated for the Phase 2, Phase 3, Phase 3.5 and Phase 4 as described in sections 5.2, 6.2, 7.2 and 8.3, providing the opportunity for the Applicant to make key announcements about the Project details on a phased basis as the Project and information evolved.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
004	Strategy for informing landowners of surveys	RR-025, RR-388, RR-393, RR-649	<p>The Applicant notes queries raised within several Relevant Representations regarding the strategy for informing landowners of surveys being undertaken for the Project.</p> <p>Section 6.4 of the Consultation Report (APP-029) describes the consultation undertaken by the Applicant with landowners.</p> <p>The land agent and the Applicant held meetings with landowners during week commencing 22nd May 2018 to inform them of the publication of the Landfall, Onshore Cable Corridor, and Substation Refined Area of Search as well as the Indicative National Grid and Overhead Line Realignment Area. Feedback was invited on this refined area.</p> <p>On 1st June 2018, letters were sent to landowners in the wider Onshore Study Area with a Landowner Information Questionnaire and requesting a meeting to discuss access for non-intrusive surveys.</p> <p>During weeks commencing the 4th and 11th June 2018 respectively, the land agent arranged meetings and door knocked several landowners in the Onshore Study Area following up on the letter of the 1st June 2018.</p> <p>PIDs were held between 28th June and 28th July 2018 at various locations in the surrounding areas of the Onshore Development Area. Any interactions with known landowners inside the Indicative Onshore Development Area were recorded and any requests for further private meetings with landowners were arranged during or following these dates.</p> <p>On 18th and 19th July 2018 meetings were held with some potentially affected landowners and their agent to ensure they were aware of the latest Phase 3 consultation and to review the Indicative Onshore Development Area.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Over the period of the Phase 3 consultation, landowners were asked to make any comments on the Indicative Onshore Development Area and any further comments on potential accesses to the Development Area to allow the Applicant to take into account any concerns raised.</p> <p>Between the 20th and 25th September 2018, individual landowner meetings were held to record any comments on the Indicative Onshore Development Area as Phase 3 consultation ended and to make landowner's aware that a new phase of consultation (Phase 3.5) was about begin on the 29th September 2018.</p> <p>A record of consultation with landowners is presented in Consultation Report Appendix 10 (APP-040).</p>
005	How representations from the general public have been / are being considered in respect of siting the substation at Friston	RR-025, RR-050, RR-167, RR-193, RR-278, RR-299, RR-330, RR-340, RR-379, RR-388, RR-393, RR-424, RR-469, RR-510, RR-517, RR-524, RR-526, RR-589, RR-605, RR-630, RR-632, RR-635, RR-649, RR-662, RR-665, RR-673, RR-707, RR-710, RR-736, RR-741, RR-749, RR-761, RR-764, RR-787, RR-793, RR-794, RR-816, RR-828, RR-831, RR-841, RR-825, RR-906, RR-919.	<p>The Applicant's internal review of onshore substations site comparison (section 4.9.1.6.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)) and preference for Friston was presented to the Local Planning Authorities, Friston Parish Council and Leiston Town Council at meetings in December 2018. Within these meetings the Applicant communicated the decision-making process (including consideration of all consultation feedback) and the onshore substation site selection decision. Section 7.2.1 of the Consultation Report (APP-029) describes in detail how representations were gathered and actioned.</p> <p>The Applicant's preference to site the onshore substations at Grove Wood, Friston followed a systematic approach of considering the alternatives established by the final Onshore Substation Site Selection Red-Amber-Green (RAG) Assessment (Appendix 4.2 (APP-443)). The Applicant's decision was informed by (section 4.9.1.3.5 of Chapter 4 Site Selection and Assessment of Alternatives):</p> <ul style="list-style-type: none"> • The Onshore Substations Site Selection RAG Assessment; • The Suffolk Coast and Heaths AONB Impact Appraisal;



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none">• The policy assessment of National Policy Statement (NPS) EN-1 relating to AONBs;• Consultation phase 3.5; and• The Applicant's consideration of land requirements, critical path programme, key policy, design / construction, operations, and commercial viability / cost. The need for these workstreams meant that an informed decision could not be reached until December 2018 when these had concluded.



2.2 Air Quality

Table 2 Applicant's Comments on Air Quality

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General and cumulative impacts	RR-042, RR-068, RR-069, RR-070, RR-071, RR-072, RR-088, RR-094, RR-095, RR-098, RR-102, RR-105, RR-106, RR-108, RR-115, RR-123, RR-128, RR-130, RR-139, RR-140, RR-144, RR-145, RR-151, RR-154, RR-155, RR-162, RR-166, RR-174, RR-178, RR-181, RR-188, RR-192, RR-196, RR-198, RR-200, RR-204, RR-208, RR-213, RR-222, RR-224, RR-236, RR-239, RR-240, RR-242, RR-243, RR-245, RR-246, RR-247, RR-248, RR-252, RR-253, RR-257, RR-263, RR-270, RR-277, RR-280, RR-292, RR-296, RR-299, RR-302, RR-308, RR-309, RR-310, RR-314, RR-317, RR-319, RR-323, RR-324, RR-328, RR-329, RR-337, RR-340, RR-343, RR-350, RR-354, RR-356, RR-357, RR-366, RR-374, RR-375, RR-376, RR-377, RR-388, RR-400, RR-403, RR-404, RR-405, RR-406, RR-413, RR-416, RR-426, RR-440, RR-445, RR-447, RR-448, RR-449, RR-451, RR-454, RR-477, RR-478, RR-494, RR-504, RR-507, RR-509, RR-521, RR-528, RR-530, RR-531, RR-532, RR-534, RR-535, RR-543, RR-547, RR-552, RR-555, RR-557,	<p>Relevant Representations in relation to air quality received from the wider community raised issues concerning:</p> <ul style="list-style-type: none"> • Construction phase air quality impacts upon human health; • Stockpile heights and dust control measures; and • Secondary impacts of wind-blown dust, including health and visibility implications. <p>An Air Quality Management Plan (AQMP) is required to be included within the Code of Construction Practice (CoCP) which must be submitted to the Local Planning Authority for approval prior to commencement of the works. The AQMP will detail control measures to manage dust and emissions during construction works.</p> <p>Chapter 19 Air Quality (APP-067) provides an assessment of the impacts on air quality arising from the Project. The chapters accompanying appendices, Appendices 19.1 to 19.4 (APP-490 to APP-493), provide further information on detailed aspects of this assessment.</p> <p>Pre-application consultation with regard to air quality was undertaken via the Air Quality Expert Topic Group (ETG), described within Chapter 5 EIA Methodology (APP-054). The Air Quality ETG stakeholder membership comprised the relevant technical leads from East Suffolk Council, Suffolk County Council and the Environment Agency. The ETG discussed the methodology for the assessment and the assumptions within it. Meetings were held in April 2018, January 2019 and May 2019.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-558, RR-562, RR-565, RR-566, RR-567, RR-568, RR-569, RR-593, RR-605, RR-617, RR-621, RR-625, RR-628, RR-630, RR-631, RR-640, RR-644, RR-647, RR-649, RR-651, RR-577, RR-587, RR-589, RR-592, RR-652, RR-653, RR-654, RR-655, RR-660, RR-666, RR-667, RR-670, RR-674, RR-685, RR-693, RR-698, RR-699, RR-706, RR-708, RR-709, RR-713, RR-714, RR-716, RR-719, RR-720, RR-731, RR-764, RR-770, RR-778, RR-781, RR-782, RR-783, RR-786, RR-788, RR-790, RR-793, RR-794, RR-797, RR-800, RR-811, RR-823, RR-827, RR-828, RR-830, RR-831, RR-834, RR-839, RR-840, RR-848, RR-851, RR-852, RR-859, RR-899, RR-873, RR-878, RR-884, RR-887, RR-888, RR-892, RR-893, RR-895, RR-904, RR-906, RR-911, RR-912	<p>The assessment of air quality presented within Chapter 19 Air Quality takes account of the relevant legislation (at a national and European level), policy (at a local and national level) and guidance, as per section 19.4.1.</p> <p>The scope of the air quality assessment presented in Chapter 19 Air Quality adhered to the requirements of the Overarching National Policy Statement for Energy (EN-1) published by the Department of Energy and Climate Change (DECC, now the Department for Business, Energy & Industrial Strategy).</p> <p><u>Construction Phase Dust and Fine Particulate Matter Emissions</u></p> <p>In addition, the assessment of construction phase dust and fine particulate matter emissions was undertaken in accordance with the latest Institute of Air Quality Management (IAQM) guidance. Section 19.4.1 of Chapter 19 Air Quality provides further details on policy and legislation considered when undertaking the assessment.</p> <p>Chapter 19 Air Quality (APP-067) covered the following construction phase impacts:</p> <ul style="list-style-type: none"> • Impact 1 – Construction Phase Dust and Fine Particulate Matter Emissions (section 19.6.1.1) • Impact 2 – Construction Phase Road Traffic Exhaust Emissions (section 19.6.1.1) <p>In accordance with the guidance, the implementation of mitigation measures which are commensurate with the level of dust risk of the site should result in impacts that are not significant. Operation phase air quality impacts were scoped out of the assessment in agreement with the Planning Inspectorate, given no operation phase impacts in relation to air quality were considered to be significant (see section 19.3.1).</p> <p><u>Cumulative Impacts</u></p> <p>The screening of projects for the onshore cumulative impact assessment (CIA) resulted in the Sizewell C New Nuclear Power Station and the Sizewell B Power</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Station Complex being included within the onshore CIA along (see Table 19.34) with East Anglia ONE North. Sizewell C New Nuclear Power Station was screened into and assessed in the Chapter 19 Air Quality. However, due to a lack of detailed information on Sizewell C New Nuclear Power Station at the time of writing, the assessment had to be conducted qualitatively, when a quantitative assessment would have been desirable. The Applicant has committed to carrying out full quantitative CIAs for air quality as the required information to inform this has been submitted within the Sizewell C New Nuclear Power Station Application. The updated CIA (as appropriate) will be submitted during the Examination of the Project.</p> <p><u>Cumulative Construction Phase Dust and Fine Particulate Matter Emissions</u></p> <p>Elements of the Sizewell C New Nuclear Power Station are within 700m of the Project's onshore development area, and therefore there is the potential for cumulative construction dust impacts where the duration of the construction phases overlaps with the Project and under cumulative Scenario 1 (where both Projects are built simultaneously) assessment detailed above.</p> <p>The Sizewell C New Nuclear Power Station Development Consent Order application will include a construction dust impact assessment in accordance with IAQM guidance. In accordance with the guidance, the implementation of mitigation measures which are commensurate with the level of dust risk of the site should result in impacts that are not significant. Significant cumulative impacts are therefore highly unlikely.</p> <p><u>Construction Phase Road Vehicle Exhaust Emissions</u></p> <p>The qualitative assessment considered three scenarios as follows:</p> <ul style="list-style-type: none"> • Sizewell C Early Years (see section 19.7.2.2.1 of the chapter); • Sizewell C Road Option (see section 19.7.2.2.2 of the chapter); and • Sizewell C Rail Option (see section 19.7.2.2.3 of the chapter).



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p><u>Early Years</u></p> <p>During the Early Years of Sizewell C construction, traffic generation would be at its most intensive and would be unmitigated. As such, there is the potential for a greater magnitude of impact within the Stratford St Andrew Air Quality Management Area (AQMA) as a result of the cumulative interaction with scenario 1 (where both Projects are built simultaneously). However, it is not anticipated that additional traffic associated with Sizewell C New Nuclear Power Station would result in an exceedance of the Air Quality Objectives³, given the magnitude of pollutant concentrations predicted for scenario 1 (as detailed in Appendix 19.2 (APP-491)). Impacts on other human receptors outside the AQMA are not anticipated to lead to a significant cumulative effect as, elsewhere in the study area, pollutant concentrations were predicted to be well below the relevant Objectives.</p> <p>With regard to ecological receptors, EDF Energy has indicated that traffic generated by Sizewell C New Nuclear Power Station would not use Link 12 (Sizewell Gap) as a means of access to the nuclear power station. As such, there would be no potential for cumulative impacts at the Sandlings Special protection Area (SPA)/Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The Sizewell Marshes SSSI would experience additional nutrient nitrogen deposition as a result of Sizewell C New Nuclear Power Station which may be above 1% of the Critical Load as cumulative impact.</p> <p><u>Road Option</u></p> <p>The Sizewell C Road Option includes the Two-Village Bypass and the Sizewell Link Road. As such, it is anticipated that the Stratford St Andrew AQMA, which would be bypassed, would experience a significant beneficial impact as the village would only be accessed by local traffic. A beneficial impact would also be experienced at other villages which would be bypassed (namely Farnham and Theberton).</p>

³ The Air Quality Strategy Objectives (England) for the Purposes of Local AQM are detailed in **Table 19.4** of **Chapter 19 Air Quality** (APP-097)



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Other human receptors outside of the bypassed villages would experience increases in pollutant concentrations, though these would be smaller in magnitude than those experienced in the more intensive Early Years scenario and are therefore not anticipated to be significant.</p> <p>Cumulative impacts at the Sandlings SPA/Leiston-Aldeburgh SSSI would not be experienced, as described above. Increases in nutrient nitrogen deposition would occur at the Sizewell Marshes SSSI, though these would be lower in magnitude than those experienced in the Early Years scenario and may be greater than 1% of the Critical Load cumulatively.</p> <p><u>Rail Option</u></p> <p>The Sizewell C Rail Option would generate fewer vehicle movements as rail traffic would also be utilised. Under this scenario, the Two Village Bypass and a smaller bypass around Theberton would be constructed.</p>
002	Air quality impacts upon human health	RR-042, RR-069, RR-070, RR-088, RR-095, RR-100, RR-114, RR-169, RR-173, RR-182, RR-188, RR-195, RR-196, RR-198, RR-200, RR-221, RR-223, RR-224, RR-241, RR-244, RR-252, RR-259, RR-263, RR-272, RR-295, RR-298, RR-308, RR-313, RR-323, RR-324, RR-326, RR-326, RR-343, RR-353, RR-357, RR-362, RR-364, RR-368, RR-378, RR-388, RR-413, RR-427, RR-437, RR-439, RR-440, RR-441, RR-443, RR-445, RR-468, RR-476, RR-483, RR-487, RR-499, RR-505, RR-559, RR-574, RR-575, RR-576, RR-580, RR-581, RR-599, RR-600, RR-640, RR-682,	<p>The Applicant notes concerns raised within Relevant Representations regarding air quality impacts on human health.</p> <p>Air quality impacts upon human health have been assessed within section 19.6.1.1 of Chapter 19 Air Quality (APP-067) in terms of magnitude, sensitivity, risk and significance, in line with IAQM guidance. Following the implementation of mitigation measures set out within section 19.6.1.1.5 of Chapter 19 Air Quality (APP-067) the residual construction phase dust and fine particulate emissions impact is assessed as not significant.</p> <p>The impact of construction phase road traffic exhaust emissions is assessed in section 19.6.1.2. The results of the construction phase road traffic emissions assessment indicate that annual mean concentrations of Nitrous Oxide (NO₂), Particulate Matter (PM₁₀ and PM_{2.5}) were predicted to be well below (i.e. less than 75% of) the respective air quality Objectives in the year of peak construction at all</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-690, RR-696, RR-709, RR-715, RR-721, RR-723, RR-727, RR-728, RR-739, RR-748, RR-756, RR-798, RR-801, RR-802, RR-803, RR-821, RR-823, RR-827, RR-848, RR-864, RR-865, RR-869, RR-892, RR-902, RR-911, RR-912, RR-916, RR-917, RR-918,	<p>receptors, including within the Stratford St Andrew AQMA, both without and with the Project in place.</p> <p>The change in NO₂ concentrations was no greater than 1% at all receptors; this corresponded to a 'negligible' impact in accordance with IAQM and Environmental Protection UK guidance (IAQM and EPUK 2017).</p> <p>IAQM and EPUK Guidance states that professional judgement should be used to determine the overall significance of impact taking into account the impact at individual receptors. This assessment concludes that development-generated traffic impacts upon local air quality are not significant based upon:</p> <ul style="list-style-type: none"> • A predicted negligible impact at all receptor locations; • Predicted pollutant concentrations were well below the relevant air quality Objectives at all considered receptor locations; • Development-generated traffic was not predicted to cause a breach of any of the air quality Objectives at any identified sensitive receptor location; and • A conservative approach to the derivation of the traffic data was taken, as described in Table 19.2 of the chapter.
003	Stockpile heights and mitigation measures	RR-088, RR-259, RR-388,	<p>The Applicant notes queries within Relevant Representations regarding stockpile heights and mitigation measures.</p> <p>Topsoil stockpiles will be controlled to preserve the integrity of the soil for reinstatement following construction of the Project and will be managed through the Code of Construction practice (CoCP) secured through Requirement 22 of the draft DCO (APP-023). Measures to mitigate the potential release of wind-blown dust from topsoil stockpiles include seeding (revegetation is anticipated to reduce windblown particulate matter at an efficiency of 90% (National Pollutant Inventory 2012)⁴),</p>

⁴ National Pollutant Inventory (2012) Emission Estimation Technique Manual for Mining, Version 3.1



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>covering and use of solid screens or barriers all of which will significantly minimise the potential for windblown dust from this source (see section 19.6.1.1.5 of Chapter 19 Air Quality (APP-067)).</p> <p>Other measures that will be considered and where appropriate incorporated into the CoCP to be produced post consent include:</p> <ul style="list-style-type: none"> • Communications (section 19.6.1.1.5.1 of the chapter); <ul style="list-style-type: none"> ○ e.g. develop and implement a Stakeholder Communication Plan • Dust management (section 19.6.1.1.5.2 of the chapter); <ul style="list-style-type: none"> ○ e.g. record all dust and air quality complaints, identify cause(s) and take appropriate measures to reduce emissions • Measures specific to earthworks (section 19.6.1.1.5.3 of the chapter); <ul style="list-style-type: none"> ○ e.g. only remove topsoil cover in small areas during work, not all at once • Measures specific to construction (section 19.6.1.1.5.4 of the chapter); <ul style="list-style-type: none"> ○ e.g. ensure sand and other aggregates are stored in silos, bunded areas or in a controlled and well-managed manner <p>Through the implementation of mitigation, the assessment construction phase dust and fine particulate matter emissions concluded an impact that was not significant in EIA terms.</p>

2.3 Commercial Fisheries

Table 3 Applicant's Comments on Commercial Fisheries

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Loss of fishing grounds	RR-074, RR-213, RR-413, RR-566, RR-738, RR-894.	<p>The Applicant notes queries raised in Relevant Representations regarding loss of fishing grounds.</p> <p>Project specific consultation with fisheries stakeholders has been ongoing since 2017 (see section 13.2 of Chapter 13 Commercial Fisheries (APP-061)) and would continue post consent through the already established Commercial Fisheries Working Group (CFWG) which covers liaison in respect to East Anglia ONE, East Anglia THREE and the Projects. Members of the CFWG include representatives from all local ports of relevance to the Projects (i.e. Sizewell, Orford, Aldeburgh, Harwich, Felixstowe, Lowestoft and Southwold).</p> <p><u>Mitigation</u></p> <p>As discussed in section 13.3.3 of Chapter 13 Commercial Fisheries (APP-061) the Applicant is committed to working closely with commercial fisheries stakeholders. The appropriate liaison will be undertaken with all relevant fishing interests to ensure they are fully informed of all construction, maintenance and decommissioning activities. In order to ensure and maintain regular communication, the CFWG has been established.</p> <p>The CFWG aims to identify and develop co-existence strategies during a project's lifecycle. A Fisheries Liaison and Co-existence Plan (FLCP) as secured through conditions 17 and 13 of the generation and transmission Deemed Marine Licences (DMLs) respectively will be produced for the Project and requires to be approved by the MMO, post-consent. It is expected that the CFWG will also be used to discuss any mitigation necessary for the Project where appropriate.</p> <p>The Applicant has appointed a Fisheries Liaison Officer (FLO) to work with the fishing industry across all East Anglia projects including the Projects.</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>As secured by conditions 17 of the generation DML and 13 of the transmission DML of the draft DCO (APP-023), a cable laying plan and proposals for monitoring offshore cables will be produced post consent. Additionally, the construction of the Project will be undertaken against a 'dropped objects procedure' that will require the Applicant to notify the MMO of any dropped objects using the Dropped Object Procedure Form.</p> <p>The FLCP, discussed above, will also include protocols for the 'snagging' or loss / damage of fishing gear associated with Project infrastructure.</p> <p>Timely and efficient Notices to Mariners (NtMs) and Kingfisher bulletins as secured in conditions 10 (notifications) and 11 (aids to navigation) of the generation DML and conditions 6 (notifications) and 7 (aids to navigation) of the transmission DML of the draft DCO (APP-023) and other navigational warnings will be issued to the fishing industry prior to all survey and construction works through a project specific marine co-ordination system</p> <p>In addition, appropriate communication with the fishing industry will be undertaken in the event that cables become unburied during the operational phase of the Project (i.e. through the FLO and appropriate channels such as the Kingfisher Information Service) as secured in condition 10 of the generation DML and condition 6 of the transmission DML of the draft DCO.</p> <p>In instances when fishing gear may need to be temporarily relocated due to construction activities, appropriate evidence-based mitigation, as specified in Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Guidelines (FLOWW 2014; 2015) will be applied.</p> <p>As far as possible offshore cables will be buried to at least 1m. Where cable protection is required (e.g. at cable crossings or areas of hard ground) their locations will be made available to fishing stakeholders. In line with standard practice in the North Sea oil and gas industry, measures would be undertaken to ensure that where cable protection is</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>required, the protection methods used are compatible with fishing activities where feasible and practical.</p> <p><u>Potential Impact</u></p> <p>The potential impact of a loss or restricted access to fishing grounds during construction for various fleets is assessed in section 13.6.1.2 of Chapter 13 Commercial Fisheries. For both local inshore UK and other UK fleets, impacts of no greater than minor adverse (i.e. not significant) are concluded for Project (i.e. not cumulative).</p> <p><u>Impacts on local inshore vessels</u></p> <p>For the assessment of potential impact of a complete loss or restricted access to fishing grounds during operation see section 13.6.2.2.3 of Chapter 13 Commercial Fisheries. The available data and the information obtained during consultation in respect of the location of fishing grounds of local inshore UK vessels, suggest that the majority of activity occurs across the offshore cable corridor (see Figure 13.27 (APP-208) to Figure 13.30 (APP-211) of the chapter). The local inshore fleet would be able to resume fishing activity along the export cables during the operational phase and therefore in general terms the magnitude of impact on the local inshore fleet is considered to be negligible.</p> <p>Due to data limitations, it is not possible to assess the impacts on individual vessels and therefore the assessment is based on individual fleets. The Applicant recognises the practices and sensitivities of the local inshore fleet and that this vessel category represents the majority of active UK vessels in the vicinity of the offshore development area. This is noted in the assessment in section 13.6.1.2.3 of Chapter 13 Commercial Fisheries (APP-061) which states that some individual vessels may experience moderate adverse impacts. The assessment recognised the need for appropriate evidence-based mitigation, as specified in FLOWW Guidelines, where required and this will be achieved via the already established CFWG.</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Whilst it is recognised that some local inshore vessels may still fish in areas further offshore within the windfarm itself, it is anticipated that for the most part, these vessels would be able to resume fishing within the operational site, although it is recognised that some changes to their mode of operation may be required in the case of vessels operating longlines and nets. Overall, the assessment for the local UK inshore fleet of a potential loss or restricted access to fishing grounds during construction and operation concluded impacts of minor adverse significance</p> <p><u>Other UK vessels</u></p> <p>Regarding other UK vessel fleets and in the particular case of UK owned and operated beam trawlers from south-west ports, it is understood that only a limited number of these vessels may occasionally target sole off the coast of East Anglia on a seasonal basis. Considering the comparatively low levels of activity by this fleet in areas relevant to the Project windfarm site, impacts of no greater than minor adverse significance were concluded for the loss of or restricted access to fishing grounds during construction and operation.</p> <p><u>Cumulative Impact</u></p> <p>With regard to the cumulative impact of a loss or restricted access to fishing grounds during operation (see section 13.7.2.2 Chapter 13 Commercial Fisheries) the assessment evaluated the potential for cumulative impacts of moderate adverse significance (which is significant in EIA terms) on, Dutch beam trawlers, Dutch seine netters and Anglo-Dutch beam trawlers, which is significant in EIA terms. However, the contribution of the Projects to the overall cumulative impact was minimal.</p>
002	Decline in stocks (crab and lobster)	RR-074, RR-213, RR-413, RR-566, RR-894	<p>The Applicant notes queries raised in Relevant Representations regarding declines in stocks of crab and lobster.</p> <p>The potential impact of the Project on shellfish is assessed in section 10.6.1 for construction impacts and section 10.6.2 for operation impacts in Chapter 10 Fish and</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Shellfish Ecology (APP-058). Potential impacts that were assessed include physical disturbance, temporary and permanent loss of habitat, increased suspended sediments and sediment re-deposition, contaminated sediment and the impacts of underwater noise.</p> <p>The assessment concluded impacts of no greater than minor adverse significance which is not significant in EIA terms.</p> <p>The potential impact of changes in fishing activity is assessed in section 10.6.1.7 of Chapter 10 Fish and Shellfish Ecology (APP-058). It is noted that shellfish species such as European lobsters and brown crabs are targeted in the offshore development area. Roach et al. (2018)⁵ found that temporary restrictions of fishing areas (e.g. as would happen during the construction phase of the project) offers respite for adult lobsters, leading to an increase in abundance and their size. As stated in section 10.6.1.1 of the chapter, temporary restrictions of fishing activity allow uninterrupted contribution to the spawning stocks. There is potential therefore for a fishery to recuperate some of the economic loss during the closure of the area, by improved landings once the area was opened again (Roach et al. 2018).</p> <p>Additionally, a review of post-consent monitoring data from offshore windfarms (MMO, 2014)⁶ reported an increase in fish and shellfish abundance and diversity in some UK and non-UK windfarms. This effect was relatively small in UK windfarms, but larger changes were detected at some non-UK windfarms (MMO, 2014).</p>

⁵ Roach, M., Cohen, M., Forster, R., Revill, A. S., and Johnson, M. (2018) The effects of temporary exclusion of activity due to wind farm construction on a lobster (*Homarus gammarus*) fishery suggests a potential management approach. – ICES Journal of Marine Science, doi:10.1093/icesjms/fsy006.

⁶ Marine Management Organisation (2014) Review of post-consent offshore wind farm monitoring data associated with licence conditions. A report produced for the Marine Management Organisation, pp 194. MMO Project No: 1031. ISBN: 978-1-909452-24-4. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/317787/1031.pdf



2.4 Cultural Heritage

Table 4 Applicant's Comments on Cultural Heritage

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Impact to heritage setting	RR-027, RR-044, RR-089, RR-121, RR-155, RR-171, RR-184, RR-195, RR-198, RR-200, RR-214, RR-205, RR-259, RR-382, RR-487, RR-508, RR-510, RR-522, RR-541, RR-635, RR-736, RR-740, RR-756, RR-778, RR-885, RR-896.	<p>The Applicant notes concerns raised within Relevant Representations regarding impacts to heritage setting.</p> <p>Impacts on heritage setting are assessed by way of assessments set out in Appendix 24.3 (APP-514) and Appendix 24.7 (APP-519) of Chapter 24 Archaeology and Cultural Heritage (APP-072). Sections 24.6.1.3.1 (construction impacts) and 24.6.2.1 (operation impacts) summarises the impacts on heritage setting. .</p> <p>The assessment was informed by site visits to understand how the Project would potentially change the heritage the setting. Any changes in setting due to construction activities would be temporary and of sufficiently short duration that they would not give rise to material harm. Indirect (non-physical) impacts as a result of change in the setting of heritage assets during the construction phase were therefore not considered.</p> <p>For the operational phase assessment two areas were identified where the operation of onshore infrastructure would lead to material change in the setting of heritage assets:</p> <ul style="list-style-type: none"> • A section of the cable route in an area of woodland immediately to the south of Aldringham Court (1393143) (a Grade II Listed Building); and • Land in the vicinity of the proposed substations at Friston. <p>Eight designated heritage assets (all Listed Buildings) were identified in these two areas where change in setting could potentially lead to material harm to their significance.</p> <ul style="list-style-type: none"> • Little Moor Farm (1215743, Grade II). • High House Farm (1216049, Grade II). • Friston House (1216066, Grade II).



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> • Woodside Farmhouse (1215744, Grade II). • Church of St Mary, Friston (1287864, Grade II*). • Friston War Memorial (1435814, Grade II). • Friston Post Mill (1215741, Grade II*). • Aldringham Court (1393143, Grade II). <p>Onshore underground cables will pass through woodland to the south of Aldringham Court within land that was formerly part of the grounds to the house. It is concluded in Appendix 24.7 that this land makes a very limited contribution to the significance of the Listed Building and the clearing of a swathe through this area of woodland would have only a very limited impact on the experience of the house in an informal woodland setting. It is considered that this change in setting is not sufficient to materially diminish the contribution that it makes to the significance of the house.</p> <p>For the seven assets (Figure 1 in Appendix 24.7) in the vicinity of the onshore substation at Friston it is the presence of the onshore substation and National Grid substation, rather than the proposed permanent overhead realignment works that would lead to adverse impact on significance. These impacts are caused primarily by the extent and visual prominence of the onshore substation and National Grid substation which would change the landscape character in the settings of heritage assets currently experienced and appreciated in a rural agricultural setting. In the case of the Church of St Mary, Friston, additional impact on significance is caused by the substations blocking valued views towards the church (of high heritage importance) and the partial loss of a footpath along and from which a view of the church can currently be experienced.</p> <p>An Outline Landscape Mitigation Plan (OLMP), as submitted with the Application as part of the Outline Landscape and Ecological Management Strategy (OLEMS) (APP-584) seeks, among other objectives, to reduce adverse impacts on the heritage assets at Friston. The OLMP has been developed to take into consideration historic landscape and</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>re-establishing historic field boundaries. In areas to the immediate north of Friston, the re-establishment of historic field boundaries, filling gaps in existing hedgerows and introducing field boundary trees has been proposed to provide layered screening, rather than large-scale woodland planting close to the village. This allows the 'setting' of Friston to be retained (rather than being contained by woodland). These proposals focus on the re-establishment of historic field boundary hedgerows / tree lines; as well as tree blocks set back from farmhouses (e.g. Covert woods).</p> <p>In the area to the north of the onshore substation and National Grid substation, the OLMP has proposed the establishment of larger woodland blocks akin to the existing pattern of woodland blocks within the wider landscape.</p> <p>The OLMP has proposed planting that is designed to avoid the effect of enclosing the historic farms in woodland, as this is not how they would have been experienced in the past. The re-establishment of historically mapped tree-lined enclosures close to the farms has been proposed, to retain farms in an open farmed landscape, whilst achieving screening through multiple lines of planting.</p> <p>A final detailed Landscape Management Plan (LMP) will be produced post-consent which will be approved by the Local Planning Authority in order to discharge Requirement 14 of the draft DCO (APP-023) which states that these plans must be produced in accordance with the OLEMS.</p> <p>Through submission and approval of the final LMP and Ecological Management Plan (EMP), the provision of landscaping associated with the construction and operation of the onshore infrastructure will be formally controlled and implemented.</p> <p>The results of the assessments of residual impacts, after mitigation, are summarised in Table 3 in Appendix 24.7. This has achieved some reduction in impact (compared to the impact prior to this mitigation), particularly for Woodside Farm. In other cases, there is some benefit but not enough to substantively change the findings of the assessment. As a result, residual impact on Little Moor Farm and Church of St Mary, Friston are assessed as being</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			of moderate adverse significance. The other receptors are however assessed as being subject to impacts of minor adverse significance which is not significant in EIA terms.
002	Impact to listed buildings (designated heritage assets)	RR-027, RR-044, RR-080, RR-094, RR-128, RR-129, RR-138, RR-149, RR-162, RR-169, RR-171, RR-182, RR-183, RR-193, RR-195, RR-196, RR-197, RR-198, RR-199, RR-200, RR-205, RR-214, RR-222, RR-225, RR-234, RR-238, RR-243, RR-245, RR-253, RR-276, RR-280, RR-299, RR-300, RR-310, RR-315, RR-322, RR-323, RR-328, RR-369, RR-340, RR-350, RR-370, RR-374, RR-376, RR-377, RR-382, RR-416, RR-421, RR-435, RR-445, RR-447, RR-448, RR-451, RR-473, RR-487, RR-493, RR-494, RR-509, RR-526, RR-527, RR-535, RR-540, RR-541, RR-545, RR-567, RR-568, RR-595, RR-596, RR-597, RR-598, RR-605, RR-637, RR-649, RR-650, RR-674, RR-690, RR-693, RR-698, RR-736, RR-743, RR-748, RR-750, RR-756, RR-759, RR-761, RR-762, RR-764, RR-773, RR-775, RR-776, RR-781, RR-782, RR-783, RR-794, RR-804, RR-818, RR-819, RR-821, RR-823, RR-829, RR-835, RR-837, RR-839, RR-851,	<p>The Applicant notes concerns raised in Relevant Representations regarding impacts to listed buildings.</p> <p>A summary of listed buildings is provided Appendix 24.2 of Chapter 24 - Archaeology and Cultural Heritage (APP-072). As stated in section 24.5.2.2 of the chapter, the onshore construction will avoid any direct physical impacts upon designated heritage assets (e.g. listed buildings / scheduled monuments) because there are no designated heritage assets within the onshore development area. Indirect (non-physical) impacts, associated with changes in setting, will, however, occur (see row 001 above).</p> <p>From the outset the site selection process (see Chapter 4 Site selection and Assessment of Alternatives) has sought to avoid listed buildings and other heritage assets and ensure appropriate buffer distances through, for example, cable route refinement.</p> <p>The potential impact of the construction of the onshore cable route, onshore substation and National Grid substation on built heritage assets is provided in section 24.6.2.1 of the chapter.</p> <p>Onshore underground cables will pass through woodland to the south of Aldringham Court within land that was formerly part of the grounds to the house. It is concluded in Appendix 24.7 (APP-519) that this land makes a very limited contribution to the significance of the Listed Building and the clearing of a swathe through this area of woodland would have only a very limited impact on the experience of the house in an informal woodland setting. It is considered that this change in setting is not sufficient to materially diminish the contribution that it makes to the significance of the house.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-877, RR-882, RR-885, RR-888, RR-893, RR-908, RR-909	<p>No intrusive groundworks are proposed in the location (within the property boundary) of the Grade II or Grade II* Listed Buildings around the onshore substation and National Grid substation (as such no impact in this category is anticipated).</p> <p>There is potential for impact on both identified and unidentified heritage assets and archaeological artefacts.</p> <p>As part of the embedded mitigation, the Project has committed to undertake additional programmes of post consent survey and evaluation (to be referred to as post consent initial informative stages of mitigation work and as discussed in Table 24.3 of the chapter) which, of relevance to sub-surface archaeological remains, may include any outstanding geophysical survey, a scheme wide programme of trial trenching (post-consent), targeted field walking and any additional metal detecting. This strategy is outlined as part of a project-specific outline Written Scheme of Investigation (OWSI) (APP-582), submitted with the Application, and the final details of this will be agreed with Suffolk County Council Archaeology Service (SCCAS) in the final WSI developed post-consent. The initial informative stages of mitigation work may indicate the presence of previously unknown buried archaeology (and further verify previously known / anticipated buried remains as indicated by the previous non-intrusive survey methods), enabling the resource to be appropriately addressed by means of mitigating any impacts in a manner that is proportionate to the significance of the remains present.</p> <p>Additional mitigation beyond the initial informative stages is envisaged to comprise a combination of the following recognised standard approaches:</p> <ul style="list-style-type: none"> • Further advance and enacting of preservation <i>in situ</i> options and requirements (e.g. avoidance / micro-siting etc., where possible); • Set-piece (open-area) Excavation: including subsequent post-excavation assessment, and analysis, publication and archiving;



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> Strip, Map and Record (or Sample) (SMR or SMS) Excavation: including subsequent post-excavation assessment, and analysis, publication and archiving; and Watching Brief (targeted and general archaeological monitoring and recording): including subsequent post-excavation assessment, and analysis, publication and archiving (where appropriate). <p>The measures adopted by the Project will be determined as it progresses in a specific and bespoke manner, tailored on a case-by-case / area-by-area basis (as required) accordingly and in response to the combination of archaeological and cultural heritage assessment. Opportunities to optimise the programme, including expedient commencement of archaeological work in the immediate post-consent stages will also be sought in ongoing discussion and agreement with SCCAS and Historic England (HE).</p> <p>Overall, the assessment of impacts on designated heritage assets during construction concluded impacts of no greater than minor adverse significance which is not significant in EIA terms.</p>
003	Impact to historic parish boundary	RR-093, RR-132, RR-133, RR-143, RR-649, RR-736, RR-851	<p>The Applicant acknowledges that the onshore substation and National Grid substation are proposed to be located on part of the historic parish boundary of Friston. The Applicant has assessed the cultural heritage impact to the historic parish boundary in two ways, both as a physical asset and within the assessment of Historical Landscape Character; and also assessed the physical loss of the Public Right of Way (PRoW) associated with the historic parish boundary:</p> <p><u>1. The potential loss of any above ground boundary features associated with the historic parish boundary</u></p> <p>Section 24.6.1.2 of Chapter 24 - Archaeology and Cultural Heritage (APP-072) assesses the potential impact on historic parish boundaries. The onshore development area includes six parish boundaries (PB1-6) five of which survive as visible features in the</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>landscape, as trackways (PB1 and PB5) or roads flanked by hedges (PB2 and PB3). The river that defines PB4 still follows the course of the boundary. The onshore cable corridor crosses five (PB2-6) of these parish boundaries (Figure 16 in Appendix 24.3). Parish boundaries are discussed in greater detail in section 24.5.4 of the chapter as part of the assessment of Historic Landscape Character.</p> <p>The onshore substation and National Grid substation location includes one parish boundary (PB1). The hedgerows associated with this boundary are classed as "Important Hedgerows" (under the Hedgerows Regulations 1997) and are therefore considered to be heritage assets.</p> <p><u>2. The potential loss of associated views of Friston from the PRoW heading south</u></p> <p>Appendix 24.7 (APP-519) discusses the 'public footpath that leads to Friston', identifying changes to the user-experience of the PRoW associated with the Parish boundary (PB1):</p> <p><i>Cultural Heritage Viewpoint 4 illustrates a view looking south from close to Little Moor Farm (1215743) along the public footpath that leads to Friston. The church tower is visible on the skyline when walking south along this path and can be seen in the baseline photography at a range of 1.2km ... It may be noted that it is proposed that this right of way will be diverted as it would be blocked by the onshore substations and National Grid substation. However, the southern end of this path closer to Friston would remain open and the views of the church in this final 350m closest to Friston would be unaffected.</i></p> <p>The settings assessment concludes that the impact of the loss of the PRoW associated with the Parish boundary (PB1) results from the loss of views of the Friston Church tower when approaching Friston from the north along the footpath from Little Moor Farm. This results in a moderate adverse impact on the significance of Friston Church's setting. This impact is stated in Table 24.21 in section 24.6.2.1 of Chapter 24 Archaeology and Cultural Heritage.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p><u>3. The potential loss of the trackway (PRoW) associated with the historic parish boundary</u></p> <p>The Applicant notes that the trackway associated with the historic parish boundary (PB1) is not a physical heritage asset recorded in the Historic Environment Record, nor is it formally designated.</p> <p>The assessment of impacts upon PRoW from the Project, i.e. the physical loss of the PRoW, is presented within Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). Section 30.6.1.4.2.1 states:</p> <p><i>There are two PRoW in the location of the onshore substation and National Grid infrastructure that will require permanent diversion (ID number: E-354/006/0 and E-387/009/0). This could result in a significant impact but will be mitigated through consultation on a permanent diversion and landscaping to develop an attractive footpath that walkers can enjoy. Therefore, the residual impact is negligible long term and minor adverse before the landscape features mature.</i></p> <p>The Applicant has engaged with the Suffolk County Council Archaeological Service through the Statement of Common Ground process and notes that Suffolk County Council and East Suffolk Council do not consider that the significance of the historic parish boundary and associated PRoW have been adequately captured. However, the Applicant considers that the historic parish boundary and associated PRoW have been assessed appropriately, as outlined above.</p> <p>As part of the site selection process, avoidance, micro-siting and onshore cable route refinement have been embedded into the design of the Project (see section 24.3.3 of the chapter), where possible (including parish boundaries). This ensures that archaeological and cultural heritage considerations inform and play an active role in ongoing design decisions, within the confines of other environmental and engineering constraints. The Applicant has been aware of the historic parish boundary since the production of the Archaeology and Cultural Heritage Desk Based Assessment (Appendix 24.3) (APP-</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>514)) in November 2018, also submitted as part of the Preliminary Environmental Information Report for Section 42 consultation. Delivery of the Project requires the onshore substation and National Grid substation to be built on the historic parish boundary (and associated PRow) and this could not be avoided.</p> <p>As part of the embedded mitigation, the Project has also committed to undertake additional programmes of post consent survey and evaluation (described in section 24.3.3.1.1 as informative stages of mitigation work). This strategy is outlined as part of a project-specific outline Written Scheme of Investigation (APP-582), which includes a range of likely mitigation options and responses to be utilised under various scenarios. The final WSI will be prepared post-consent in consultation with SCCAS and HE.</p> <p>Impact to the Historic Landscape Characterisation (HLC) (including hedgerows and parish boundaries) will be minimised by returning field boundaries / areas / hedgerows to their preconstruction condition and character post-construction where possible, as part of a sensitive programme of backfilling and reinstatement / landscaping (see section 24.3.3.1). Certain hedgerows and field boundaries (e.g. parish boundaries) may require recording prior to the construction process and enhanced provisions made during backfilling and reinstatement.</p> <p>Further detail regarding hedgerow reinstatement is provided in the OLEMS (APP-584), secured under the requirements of the draft DCO (APP-023) and submitted with this Application. The final LMP will be produced post-consent and approved by the relevant planning authority.</p> <p>The mitigation measures adopted by the Project will be determined as the Project progresses in a specific and bespoke manner, tailored on a case-by-case / area-by-area basis (as required) accordingly and in response to the combination of archaeological and cultural heritage survey and assessment, initial targeted surveys (Table 24.3) and post-consent investigations (section 24.3.3.1.1) of the Project.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>An Outline Landscape Mitigation Plan (OLMP) as submitted with the application as part of the OLEMS seeks, among other objectives, to reduce adverse impacts on heritage assets. The OLMP has been developed to take into consideration historic landscape and re-establishing historic field boundaries. This includes the re-establishment of historic field boundaries, filling gaps in existing hedgerows and introducing field boundary trees where appropriate.</p> <p>A final detailed LMP will be produced post-consent which will be approved by the Local Planning Authority in order to discharge Requirement 14 of the draft DCO (APP-023) which states that these plans must be produced in accordance with the OLEMS.</p> <p>Through submission and approval of the final LMP, the provision of landscaping associated with the construction and operation of the onshore infrastructure will be formally controlled and implemented.</p>



2.5 Cumulative Impacts of All Projects

Table 5 Applicant's Comments on Cumulative Impacts of All Projects

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General cumulative	RR-018, RR-019, RR-022, RR-023, RR-025, RR-027, RR-042, RR-043, RR-044, RR-045, RR-049, RR-050, RR-051, RR-068, RR-069, RR-071, RR-072, RR-075, RR-076, RR-081, RR-087, RR-088, RR-089, RR-095, RR-098, RR-099, RR-100, RR-102, RR-105, RR-106, RR-108, RR-109, RR-112, RR-116, RR-119, RR-121, RR-122, RR-123, RR-125, RR-129, RR-132, RR-133, RR-136, RR-137, RR-138, RR-139, RR-140, RR-141, RR-142, RR-143, RR-144, RR-145, RR-146, RR-148, RR-149, RR-151, RR-154, RR-157, RR-158, RR-162, RR-163, RR-165, RR-166, RR-169, RR-170, RR-171, RR-172, RR-173, RR-178, RR-182, RR-184, RR-185, RR-186, RR-188, RR-193, RR-194, RR-195, RR-196, RR-198, RR-199, RR-200, RR-203, RR-207, RR-208, RR-209, RR-211, RR-213, RR-214, RR-215, RR-220, RR-221, RR-222, RR-223, RR-224, RR-225, RR-231, RR-233, RR-234, RR-235, RR-236, RR-238, RR-239, RR-240, RR-241, RR-243, RR-244, RR-245, RR-246, RR-249, RR-251, RR-252, RR-253, RR-259, RR-262, RR-263, RR-264, RR-266, RR-270, RR-272, RR-273, RR-277, RR-278, RR-279, RR-280, RR-281,	<p>The Applicant notes concerns raised within Relevant Representations regarding cumulative impacts.</p> <p><u>Methodology</u></p> <p>A cumulative impact assessment (CIA) has been carried out for each of the considered receptor topics in chapters 7 to 30 (APP 055-078) of the Environmental Statement. The approach used for the CIA follows Planning Inspectorate Advice Note 17. Where it is helpful to do so 'Tiers' of these projects' development statuses have been defined as well as the availability of information to be used within the CIA. This approach is based on the three tier system proposed in Planning Inspectorate Advice Note 17 as summarised in the following:</p> <ul style="list-style-type: none"> • Tier 1 – Projects under construction, permitted or submitted applications; • Tier 2 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has</u> been submitted; and • Tier 3 – Projects on the Planning Inspectorate's Programme of Projects where a scoping report <u>has not</u> been submitted; projects identified in the relevant Development Plan (and emerging Development Plans); and projects identified in other plans and programmes (as appropriate) which set out the framework for future development consent. <p>Tier 1 and Tier 2 projects are included in all relevant CIAs within the ES. Generally, Tier 3 projects have not been included within each CIA due to insufficient information available on which to base an assessment, in line with Advice Note 17.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-283, RR-286, RR-287, RR-288, RR-289, RR-290, RR-293, RR-294, RR-295, RR-296, RR-298, RR-300, RR-305, RR-308, RR-310, RR-314, RR-319, RR-321, RR-322, RR-323, RR-325, RR-326, RR-328, RR-330, RR-331, RR-336, RR-341, RR-343, RR-352, RR-354, RR-356, RR-357, RR-358, RR-359, RR-361, RR-363, RR-364, RR-365, RR-367, RR-368, RR-369, RR-371, RR-373, RR-374, RR-376, RR-377, RR-378, RR-379, RR-382, RR-383, RR-384, RR-386, RR-387, RR-388, RR-389, RR-390, RR-391, RR-393, RR-396, RR-400, RR-403, RR-405, RR-406, RR-408, RR-409, RR-413, RR-416, RR-425, RR-426, RR-427, RR-428, RR-432, RR-433, RR-435, RR-436, RR-437, RR-439, RR-440, RR-441, RR-445, RR-446, RR-447, RR-448, RR-449, RR-450, RR-451, RR-452, RR-454, RR-458, RR-459, RR-460, RR-462, RR-464, RR-465, RR-467, RR-468, RR-469, RR-470, RR-471, RR-472, RR-473, RR-476, RR-477, RR-478, RR-487, RR-490, RR-491, RR-492, RR-493, RR-494, RR-495, RR-496, RR-497, RR-499, RR-500, RR-502, RR-504, RR-505, RR-509, RR-511, RR-513, RR-515, RR-516, RR-518, RR-521, RR-523, RR-524, RR-528, RR-531, RR-532, RR-535, RR-536, RR-540, RR-541, RR-542,	<p>In some technical chapters, a more refined tiering system based on the guidance issued by JNCC and Natural England in September 2013⁷ is employed. This approach was acknowledged within the Planning Inspectorate's Scoping Opinion (APP-033).</p> <p>The CIA takes into consideration other relevant projects or activities (e.g. offshore aggregate dredging and nuclear power stations) on a case by case basis for each receptor. Each topic CIA describes a screening exercise which has been undertaken to screen in potential projects to the assessment. The project screening exercise followed Advice Note 17 and the list of projects to be included was agreed with relevant stakeholders through Expert Topic Group (ETG) meetings and consultation on the Preliminary Environmental Information Report.</p> <p><u>Cumulative impact of East Anglia ONE North and East Anglia TWO</u></p> <p>For onshore topics, given that the majority of impacts identified are temporary and / or localised within the area of the onshore infrastructure, the key cumulative impacts arise from the construction of the Projects together (either sequentially or concurrently). The two Projects share the same landfall and onshore cable corridor and the onshore substations are co-located and connect into the same National Grid substation.</p> <p>Further information regarding the proposed construction scenarios for the Projects is given within each onshore impact assessment chapter. The CIA is summarised within each impact assessment chapter and the assessment itself is provided as an appendix to each impact assessment chapter.</p>

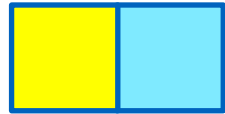
⁷ JNCC and Natural England (2013). Suggested Tiers for Cumulative Impact Assessment.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-544, RR-545, RR-546, RR-547, RR-552, RR-555, RR-560, RR-564, RR-565, RR-566, RR-567, RR-568, RR-571, RR-574, RR-575, RR-576, RR-577, RR-578, RR-582, RR-583, RR-585, RR-587, RR-589, RR-594, RR-597, RR-599, RR-600, RR-605, RR-610, RR-617, RR-619, RR-620, RR-625, RR-626, RR-627, RR-628, RR-630, RR-631, RR-632, RR-633, RR-637, RR-639, RR-644, RR-649, RR-652, RR-653, RR-654, RR-656, RR-661, RR-662, RR-665, RR-666, RR-668, RR-670, RR-674, RR-675, RR-677, RR-682, RR-683, RR-684, RR-685, RR-691, RR-693, RR-694, RR-696, RR-698, RR-699, RR-700, RR-705, RR-706, RR-707, RR-708, RR-709, RR-710, RR-713, RR-714, RR-715, RR-717, RR-720, RR-721, RR-724, RR-725, RR-732, RR-736, RR-737, RR-739, RR-740, RR-745, RR-746, RR-747, RR-748, RR-749, RR-750, RR-752, RR-754, RR-758, RR-759, RR-761, RR-763, RR-764, RR-766, RR-768, RR-771, RR-773, RR-776, RR-778, RR-781, RR-782, RR-783, RR-785, RR-787, RR-788, RR-789, RR-790, RR-791, RR-793, RR-794, RR-795, RR-797, RR-798, RR-801, RR-802, RR-803, RR-810, RR-811, RR-813, RR-814, RR-815, RR-816, RR-823, RR-824, RR-825, RR-827, RR-829, RR-830, RR-834, RR-837, RR-839, RR-841, RR-845, RR-847, RR-848, RR-849, RR-851, RR-852,	<p>For each onshore receptor the CIA has two stages, the first stage considers the combined effects of East Anglia ONE North and TWO together with the second stage adding any other relevant projects to the assessment.</p> <p><u>Consideration of Sizewell B and Sizewell C</u></p> <p>The screening of projects for the onshore CIA resulted in the Sizewell C New Nuclear Power Station and the Sizewell B Power Station Complex being included within the onshore CIA along with the Projects. Sizewell C New Nuclear Power Station was screened into and assessed where relevant in a number of the topic CIAs. However, due to the lack of detailed information on Sizewell C New Nuclear Power Station available at the time of writing, some of these assessments had to be conducted qualitatively, when a quantitative assessment would have been desirable (e.g. for the traffic and transport and air quality assessments). The Applicant has committed to carrying out full quantitative CIAs for these topics. The required information to inform this has now been submitted within the Sizewell C New Nuclear Power Station Application. The updated CIA (as appropriate) will be submitted during the Examination of the Project.</p> <p><u>Projects not considered</u></p> <p>Following the guidance in Advice Note 17, the below projects were not considered in the CIA because at the time the Project CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales):</p> <ul style="list-style-type: none"> • Nautilus; • EuroLink; • Greater Gabbard Offshore Windfarm Extension; and • Galloper Offshore Windfarm Extension.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-853, RR-854, RR-855, RR-858, RR-859, RR-860, RR-861, RR-863, RR-864, RR-865, RR-866, RR-868, RR-871, RR- 872, RR-873, RR-874, RR-876, RR-877, RR-878, RR-879, RR-880, RR-881, RR-885, RR-887, RR-888, RR-891, RR-893, RR-899, RR-902, RR-904, RR-906, RR-907, RR-908, RR-909, RR-911, RR-912, RR-916, RR-917, RR-918, RR-919.	<p>Each of these projects is nationally significant and therefore will require its own EIA and as part of that process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Project in each of their respective EIAs as they progress through the planning process.</p> <p><u>Conclusions of significant cumulative impact onshore</u></p> <p>For onshore and wider scheme topics, significant cumulative impacts were identified for three topics (i.e. Chapter 28 Seascape, Landscape and Visual Impact Assessment (APP-076), Chapter 29 Landscape and Visual Impact Assessment (APP-077) and Chapter 30 Socio-economics, Tourism and Recreation (APP-078)). See Table 27, Table 12, Table 13, Table 30 for further details.</p> <p><u>Conclusions of significant cumulative impact offshore</u></p> <p>For offshore receptor topics, only one cumulative impact was assessed as being significant in EIA terms once any required mitigation had been applied. This was in the Chapter 13 Commercial Fisheries (APP-061) assessment which concluded the potential for a significant cumulative impact due to the cumulative loss or restricted access to fishing grounds from all projects assessed (see Table 3 for further detail of the impact on commercial fisheries).</p>



2.6 East Anglia Hub

Table 6 Applicant's Comments on East Anglia Hub

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Information regarding the East Anglia Hub	RR-041, RR-152.	<p>ScottishPower Renewables (of which the Applicant is a wholly owned subsidiary) is proposing to construct its future offshore windfarms, East Anglia THREE, East Anglia TWO and East Anglia ONE North, as a new 'East Anglia Hub'.</p> <p>In the event that Development Consent Orders are granted for East Anglia TWO and East Anglia ONE North, the three projects would be developed under the East Anglia Hub umbrella, but would remain as three distinct projects.</p> <p>The offshore and onshore layouts, onshore substation locations and project parameters of the East Anglia THREE, East Anglia TWO and East Anglia ONE North projects would remain as set out in the applications. The grid connection details of the individual projects also remain unchanged with East Anglia THREE connecting at Bramford and East Anglia ONE North and East Anglia TWO connecting at Friston.</p> <p>Under this concept, the East Anglia Hub could deliver multiple and wide reaching benefits and efficiencies such as reduced construction timescales, sustained contracting opportunities for the supply chain and a reduction in the cost of clean, renewable energy.</p> <p>The new Hub will generate enough power for up to 2.8 million homes</p>



2.7 Environmental Impact Assessment Methodology

Table 7 Applicant's Comments on Environmental Impact Assessment Methodology

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Approach to Environmental Impact Assessment	RR-025, RR-088, RR-155, RR-184, RR-191, RR-195, RR-283, RR-328, RR-375, RR-388, RR-447, RR-487, RR-804, RR-834, RR-851, RR-917, RR-919.	<p>The Applicant notes queries raised in Relevant Representations regarding the approach to undertaking the Environmental Impact Assessment (EIA), the approach taken is detailed in Chapter 5 EIA Methodology (APP-053).</p> <p>The EIA has been carried out in accordance with the Planning Act 2008, the Infrastructure Planning (EIA) Regulations 2017 (the EIA Regulations) and following Planning Inspectorate Advice Notes. The approach to the EIA was consulted upon during all phases of consultation for the Project, as detailed in section 5.3 of Chapter 5 EIA Methodology (APP-053). Furthermore, technical consultation through Expert Topic Groups (ETGs) as part of the Evidence Plan Process (EPP) ensured agreement on the scope and approach to the impact assessment for each topic, as detailed in section 5.3.4 of Chapter 5 EIA Methodology (APP-053).</p> <p>Appendix 5.2 Statement of Competency (APP-449) explains that the EIA was undertaken by competent experts, led by Royal HaskoningDHV whose EIA activities and Environmental Statements (ES) are accredited by the Institute of Environmental Management and Assessment (IEMA) under the EIA Quality Mark Scheme.</p> <p>Royal HaskoningDHV has worked at the forefront of the offshore wind industry, with over 15 years' market leading experience and over 100 professional experts, having led the successful consent of 10GW of offshore wind in the UK alone. The appointment of Royal HaskoningDHV and their experience demonstrates the Applicant's commitment to obtaining high quality advice; providing assurance to regulators and stakeholders that all Project permutations are assessed, and the</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Applicant understands and can mitigate the impacts that could arise once the final design has been fixed.</p> <p>The EIA Quality Mark is a scheme operated by IEMA that allows organisations (both developers and consultancies) that lead the co-ordination of statutory EIAs in the UK to make a commitment to excellence in their EIA activities and have this commitment independently reviewed. The EIA Quality Mark is a voluntary scheme, with organisations free to choose whether they are ready to operate to its seven EIA Commitments.</p>
002	Project Design Envelope Approach	RR-050, RR-088, RR-214, RR-691, RR-781, RR-834, RR-917	<p>Relevant Representations raised queries regarding the Project design envelope approach used within the assessments for the Project.</p> <p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains the method of using a project design envelope approach, also known as a Rochdale Envelope. This approach is recognised by the Planning Inspectorate in their Advice Note Nine: Rochdale Envelope (Planning Inspectorate 2018)⁸. The Rochdale Envelope allows for the maximum adverse case scenario (i.e., worst case) to be assessed in the Environmental Statement (ES) and a DCO granted on this basis (section 3.3.2.2 of Chapter 3 Policy and Legislative Context (APP-051)). This flexibility is important as it prevents consent being granted for specific infrastructure or a particular layout which is not possible or optimal by the time of construction, which may be several years after the application was made.</p> <p>A realistic worst-case scenario has been used to assess potential impacts on specific receptors. The worst case scenarios assessed for each receptor-specific topic is presented in sections 2 or 3 of each ES chapter.</p>

⁸ The Planning Inspectorate (2018) Advice Note Nine: Rochdale Envelope.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			The Project design envelope for the Project is detailed in Chapter 6 Project Description (APP-054).
003	Assigning Significance	RR-050, RR-416, RR-649, RR-691, RR-696, RR-787, RR-887, RR-919.	<p>These Relevant Representations raised concerns regarding the approach to assessing significance within the EIA.</p> <p>The approach to making balanced assessments for the Project has been guided by the Royal HaskoningDHV EIA team and technical specialists using existing data, new data collected specifically for the Project, experience and expert judgement. In order to provide a consistent framework and system of common tools and terms, a matrix approach has been used to frame and present the judgements made.</p> <p>For each topic, the most relevant guidance has been used. Furthermore, technical consultation through ETGs as part of the Evidence Plan Process (EPP) allowed relevant stakeholders to provide comments and influence the approach to the assessment. In addition, as can be seen from a review of the consultation appendices provided for each ES chapter, there were many instances where stakeholder comments, particularly on the Preliminary Environmental Information Report, led to revisions of the significance of impact reported in the final ES.</p> <p>The approach to assessing potential impacts is discussed in section 5.6 of Chapter 5 EIA Methodology (APP-053) and Tables 5.3 to 5.6 display the matrix approaches used to assess and define the significance of impacts.</p>

2.8 General Offshore Comments

Table 8 Applicant's Comments on General Offshore Comments

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General offshore impacts	RR-088, RR-566, RR-648, RR-738	<p>Some Relevant Representations raised concerns about the impact of the Project on various offshore receptors.</p> <p>An assessment of the potential offshore impacts of the Project is provided in Chapter 7 to 17 (APP-055 to APP-065) for various receptor topics. These include fish and shellfish, marine mammals, seabirds, shipping and navigation, archaeology and cultural heritage etc. Each topic assessment was screened in following detailed consultation with the relevant statutory consultees and other key stakeholders.</p> <p>None of the assessments (except cumulative commercial fisheries impacts (see below)) conclude an impact of greater than minor adverse which is not considered significant in EIA terms. This includes cumulative impacts. The only exception to this is for the Chapter 13 Commercial Fisheries (APP-061) assessment which evaluated a potential for a cumulative impact of moderate adverse significance due to the cumulative loss or restricted access to fishing grounds (see Table 3 for more detail on commercial fisheries impacts).</p> <p>The Information to Support Appropriate Assessment Report (APP-043), provides an assessment of the potential effects of the Project on European sites including the southern North Sea Special Area of Conservation (SAC), Outer Thames Estuary Special Protection Area (SPA), Greater Wash SPA, Flamborough and Filey Coast SPA, Alde Ore Estuary SPA, Breydon Water SPA, the Wash and North Norfolk Coast SAC. The assessment concluded no adverse effect on integrity for any of these sites at both the Project level and the Projects in-combination (cumulative impact) with others.</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
002	Recreational / leisure craft passage	RR-304, RR-121	<p>The Applicant notes the concern raised within these Relevant Representations with regards to potential impacts on recreational / leisure craft passage.</p> <p>An assessment of the potential impacts of the Project on recreational / leisure craft is provided in section 14.6.5 of Chapter 14 Shipping and Navigation (APP-062).</p> <p>The site specific marine summer traffic survey results showed relatively high numbers (compared to other areas of the UK) of recreational craft in the area.</p> <p>During construction, it is expected that the majority of recreational activity would avoid the buoyed construction area altogether. The publicising of information through Notices to Mariners (NtMs) and other communication formats would ensure recreational users are well informed of the Project. This embedded mitigation would ensure that recreational users are aware of ongoing construction activities (including current safety zones) although some recreational craft may still enter the buoyed construction area including accidentally. If a recreational vessel were to enter into the buoyed construction area a guard vessel (or other vessels on site) would inform the vessel of the ongoing works.</p> <p>Experience in windfarm construction for developers, their contractors and the vessel operators is now extensive, with a number of operational windfarms having been constructed in proximity to busy shipping areas and in the vicinity of other offshore windfarms. Consequently, standard mitigation measures (including adequate lighting and marking to international guidelines, use of guard vessels etc.), as outlined in the embedded mitigation section 14.3.3 Chapter 14 Shipping and Navigation are tried and tested within the industry.</p> <p>The severity of consequence conclusion is considered to be minor due to the most likely scenario being displacement of vessels rather than any increased collision or collision risk and the frequency of effect is considered to be remote, given the</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>adaptability of recreational craft to the site. The impact has therefore been classed as broadly acceptable for navigational safety during transit.</p> <p>An assessment of the potential operational impact is provided in section 14.6.5.3 of the chapter.</p> <p>Minimum row spacing of 800m between wind turbines should allow adequate sea room for recreational craft to navigate through the windfarm. It is noted that there are factors that would influence a mariner's decision (including those of recreational craft) to navigate through, around or avoid a windfarm such as the vessels characteristics, the weather and sea conditions. The recreational sailor is likely to take due consideration of the weather conditions and passage plan accordingly to ensure safe passage. During the winter survey (November /December 2017), only two recreational craft were recorded within the shipping and navigation study area suggesting that recreational craft are unlikely to transit the area in poor weather conditions.</p> <p>The air clearance between wind turbines rotors and sea level at Mean High Water Spring (MHWS) will not be less than 22m, as per MGN 543 and RYA guidance therefore minimising the risk of interaction between rotor blades and yacht masts of a recreational craft transiting through the windfarm site.</p> <p>The severity of consequence conclusion is considered to be minor given the limited potential for damage (lower speed allision) and the frequency of effect is considered to be remote given the level of recreational activity. The impact has therefore been classed as broadly acceptable for navigational safety during transit.</p>
003	Coastal erosion and sea level rise	RR-019, RR-111, RR-560, RR-877.	Table 24 describes the landfall site selection process and coastal erosion studies that have been undertaken to inform the feasibility of the landfall location.



2.9 Grid Connection Point

Table 9 Applicant's Comments on Grid Connection Point

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Grid connection location	RR-069, RR-070, RR-101, RR-128, RR-132, RR-151, RR-154, RR-170, RR-184, RR-204, RR-225, RR-281, RR-321, RR-324, RR-340, RR-341, RR-356, RR-388, RR-446, RR-457, RR-487, RR-513, RR-514, RR-540, RR-583, RR-616, RR-620, RR-637, RR-662, RR-749, RR-772, RR-775, RR-793, RR-804, RR-823, RR-885, RR-887, RR-907.	<p>A number of Relevant Representations raised questions regarding the grid connection location for the Projects.</p> <p>Section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) provides an overview of the Connection and Infrastructure Options Note (CION) process in respect of the grid connection location and describes how, in 2010, Bramford was the most economic and efficient connection point for the East Anglia ONE, East Anglia TWO and East Anglia THREE projects at that time. In 2016 SPR identified the redefined East Anglia TWO and East Anglia ONE North projects as the next projects to be brought forward for development consent.</p> <p>ScottishPower Renewables (UK) Limited (of which the Applicant is a wholly owned subsidiary) engaged with National Grid in early 2017 to determine connection options for the Projects based on contracted background at that time and reflecting the Projects' timescales and reduced capacities. This resulted in the CION review process which identified a number of potential connection locations and appraised each against a high-level assessment of programme, construction complexity, land availability, environmental / consenting issues and cost. The potential connection locations considered were:</p> <ul style="list-style-type: none"> • Bradwell • Bramford • Cromer / Bacton area • Dereham / Shipdham / Brandon • Diss / Eye



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> • Kings Lynn • Leiston area • Little Dunham / Necton • Lowestoft area • Norwich • Sizewell • Walpole <p>National Grid advised that due to the changing contracted background, connection capacity could be available in the Sizewell / Leiston area. The CION process was subsequently triggered and concluded that the most economic and efficient connections for the Projects, while considering environmental and programme implications, would be into the circuits in or around Leiston.</p> <p>On identification of the general area of the grid connection, the Applicant identified an area of search for the onshore substation site selection process which followed a chronological progression of increasing refinement in order to arrive at the selected location at Grove Wood, Friston, as detailed in Section 4.9.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052). See also the Applicant's response with regard to the site selection process in Table 24, Table 25 and Table 26 below.</p>



2.10 Human Health

Table 10 Applicant's Comments on Human Health

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Electromagnetic Fields / Radiation	RR-112, RR-114, RR-132, RR-188, RR-195, RR-204, RR-208, RR-214, RR-230, RR-282, RR-295, RR-315, RR-367, RR-388, RR-402, RR-413, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-447, RR-448, RR-449, RR-458, RR-468, RR-531, RR-542, RR-559, RR-560, RR-574, RR-575, RR-576, RR-580, RR-586, RR-653, RR-665, RR-670, RR-679, RR-702, RR-757, RR-765, RR-776, RR-796, RR-811, RR-829, RR-853, RR-854, RR-873, RR-908, RR-909.	<p>Relevant Representations raised concerns regarding potential impacts of Electro Magnetic Fields (EMF) and radiation as a result of the operation of the onshore substation, the National Grid substation, and the onshore cables</p> <p>The Applicant's policy is to only design and install equipment that is compliant with the relevant exposure limits and all equipment will be assessed in accordance with the provisions of the UK Government's Code of Practice on Compliance. This is compliant with the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidance (ICNIRP 1998)⁹.</p> <p>In both Projects' Scoping Opinions (APP-033) Public Health England (PHE) note that the evidence to date suggests that, in general, there are no adverse effects on the health of the UK population caused by exposure to extremely low frequency electromagnetic fields below the guideline levels. Any EMF which may be produced as a result of the Project will be below the guideline levels.</p> <p>Issues related to EMF have been considered in the following submission documents:</p> <ul style="list-style-type: none"> • Section 27.4.1.3 and 27.6.3.2 of Chapter 27 Human Health (APP-075); and • Section 27.2.2.7 of Appendix 27.2 Scientific Literature Review Relevant to Human Health (APP-554).

⁹ International Commission on Non Ionizing Radiation Protection (1998) Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic and Electromagnetic Fields. Health Physics, 74 (4), p.494.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
002	Mental Health Impacts	<p>RR-025, RR-027, RR-043, RR-051, RR-069, RR-128, RR-132, RR-162, RR-196, RR-203, RR-222, RR-253, RR-280, RR-302, RR-310, RR-315, RR-232, RR-328, RR-350, RR-416, RR-435, RR-445, RR-451, RR-475, RR-493, RR-494, RR-509, RR-527, RR-535, RR-547, RR-567, RR-602, RR-603, RR-605, RR-637, RR-658, RR-660, RR-679, RR-722, RR-770, RR-771, RR-794, RR-821, RR-829, RR-885, RR-887, RR-839 (Local economic changes).</p> <p>RR-025, RR-070, RR-071, RR-093, RR-115, RR-128, RR-132, RR-138, RR-204, RR-208, RR-227, RR-241, RR-388, RR-445, RR-447, RR-449, RR-493, RR-526, RR-547, RR-574, RR-637, RR-651, RR-785, RR-770, RR-821, RR-839, RR-908, RR-909 (Noise)</p> <p>RR-021, RR-069, RR-093, RR-098, RR-102, RR-116, RR-128, RR-138, RR-169, RR-173, RR-178, RR-195, RR-203, RR-204, RR-209, RR-224, RR-226, RR-241, RR-296, RR-365, RR-389, RR-390, RR-436, RR-437, RR-439, RR-441, RR-445, RR-476, RR-477, RR-487, RR-499, RR-545, RR-547, RR-571, RR-611, RR-612, RR-649, RR-650, RR-652, RR-653, RR-682, RR-691, RR-706, RR-708, RR-715, RR-721, RR-786, RR-788, RR-798, RR-801, RR-802, RR-803, RR-804, RR-818, RR-819, RR-859, RR-865, RR-903, RR-916, RR-918 (Lighting)</p>	<p><u>Applicant's consideration of mental health impacts</u></p> <p>The Applicant notes a range of concerns from the general public regarding mental health and recognises that the Project will evoke responses which will vary across individuals. The Applicant has therefore sought to engage with local communities as effectively as possible since the Project's inception, through a series of public information days (PIDs) (section 27.2 of Chapter 27 Human Health (APP-075)) and other methods (described further in the Consultation Report (APP-029)) in order to communicate and consult on Project developments as early as possible, as recommended by Public Health England to reduce mental health effects associated with stress, uncertainty and anxiety. See Table 1 for more details on consultation.</p> <p>The Applicant has sought to assess human health impacts (Chapter 27 Human Health (APP-075)) in accordance with local strategy (e.g. Suffolk's Joint Health and Wellbeing Strategy) and best practice (e.g. the use of data from Public Health England to inform the assessment baseline and using the methodology agreed with Public Health England (section 27.4)).</p> <p><u>Construction and operational disturbance</u></p> <p>Due to the inherent variability between individuals and their personal responses, it is challenging to extrapolate disturbance impacts into a directly quantifiable assessment on mental health. The Applicant has therefore followed guidance from Public Health England to quantify health impacts where there is an evidence base for cause and effect relationships.</p> <p>Following the approach described above, the Applicant has considered human health effects (Chapter 27 Human Health) during construction due to changes in noise (section 27.6.1.1), air quality (section 27.6.1.2), ground or water contamination (section 27.6.1.3), physical activity (section 27.6.1.4) and</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-043, RR-068, RR-069, RR-070, RR-114, RR-116, RR-208, RR-388, RR-445, RR-493, RR-526, RR-574, RR-652, RR-770, RR-821, RR-893, RR-908, RR-909 (Traffic)	journey times / reduced access to health services (section 27.6.1.5) for multiple receptor groups. The assessment finds that for the general population there would be no significant impacts (in EIA terms) on human health as a result of the construction of the Project.
		RR-043, RR-069, RR-133, RR-300, RR-446, RR-526, RR-547, RR-640, RR-658, RR-770, RR-794, RR-829, RR-873 (Public Right's of Way)	During operation, the Applicant has considered health outcomes relating to local employment (section 27.6.2.1), perception of risk (section 27.6.2.2), noise (section 27.6.3.1) and electromagnetic field effects (section 27.6.3.2). The assessment finds that for the general population there would be no significant impacts (in EIA terms) on human health during the operational phase of the Project.
		RR-043, RR-069, RR-071, RR-132, RR-133, RR-208, RR-302, RR-447, RR-449, RR-493, RR-526, RR-547, RR-574, RR-637, RR-651, RR-821, RR-908, RR-909 (Visual)	Concerns in Relevant Representations regarding mental health specifically relate to visual impacts (Table 12 and Table 13), public rights of way (Table 23), tourism (Table 30), noise (Table 15 and Table 16), lighting (Table 14), traffic (Table 31) and air quality (Table 2). Please refer to each topic's respective Relevant Representation response for further information regarding the method of assessment, guidance followed, assessed impacts and proposed mitigation.
		RR-025, RR-027, RR-043, RR-068, RR-071, RR-076, RR-093, RR-128, RR-203, RR-227, RR-547, RR-651, RR-887 (Tourism).	Where mitigation is proposed, further detail is provided on how this is captured and secured within the draft Development Consent Order (APP-023) and post-consent requirements.



2.11 Land Use

Table 11 Applicant's Comments on Land Use

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Loss of Grade 2 and Grade 3 agricultural land	RR-027, RR-044, RR-069, RR-072, RR-089, RR-148, RR-178, RR-182, RR-193, RR-195, RR-210, RR-234, RR-246, RR-278, RR-279, RR-327, RR-333, RR-341, RR-350, RR-370, RR-382, RR-423, RR-424, RR-436, RR-446, RR-487, RR-510, RR-513, RR-517, RR-524, RR-540, RR-545, RR-541, RR-565, RR-597, RR-598, RR-643, RR-649, RR-654, RR-671, RR-684, RR-685, RR-694, RR-702, RR-703, RR-704, RR-710, RR-723, RR-732, RR-737, RR-739, RR-741, RR-743, RR-747, RR-749, RR-754, RR-759, RR-760, RR-783, RR-791, RR-794, RR-816, RR-821, RR-833, RR-837, RR-841, RR-845, RR-851, RR-877, RR-882, RR-887.	<p>The Applicant notes concerns raised in Relevant Representations regarding the loss of Grade 2 and Grade 3 agricultural land.</p> <p>As described within section 21.6.1.1 of Chapter 21 Land Use (APP-069), a total of approximately 49.52 hectares (ha) of agricultural land could be taken out of existing use for the construction phase of the onshore cable route and landfall and 46.28ha (section 21.6.1.1.2) for the construction phase of the Project onshore substation and National Grid infrastructure for the Project. The construction footprint of the onshore cable route and landfall (including potential ecological mitigation areas) constitutes approximately 0.01% of the total farmed land within Suffolk.</p> <p>The majority of this land is assigned an Agricultural Land Classification of Grade 3-4. With the implementation of embedded mitigation (section 21.3.3), including reinstatement of land at the landfall and along the cable corridor, the residual impact on land taken out of existing use is assessed as minor adverse (in EIA terms).</p> <p>Operational phase impacts to agricultural land arising from the operation of the landfall and onshore cable routes are limited to the narrow strip of land above the onshore cables over which the Applicant is likely to acquire cable protection rights. The Applicant will seek to ensure as far as possible that agricultural activities along the onshore cable route can continue during the operational period (section 21.6.2.1.1).</p> <p>The operation phase, and therefore permanent land take for the onshore substation and National Grid Infrastructure would total 33.59ha (which includes 22.78ha of landscaping). For all three substations (East Anglia TWO, East Anglia ONE North</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>and the National Grid substation) the permanent land take would be 37.2ha (which includes 22.78ha of landscaping). Although the land is assigned as Grade 2-3 agricultural land, the total area lost cumulatively represents approximately 0.01% of Suffolk's total farmed resource. In the context of the county, the residual impact is assessed to be of minor adverse significance (in EIA terms) (section 21.6.2.1.2).</p> <p>The Applicant has committed to undertaking discussions with landowners regarding potential future land uses and any restrictions on these as part of ongoing discussions between landowners and the Applicant.</p>
002	Siting of onshore infrastructure on previously undeveloped (greenfield) land	RR-096, RR-105, RR-138, RR-151, RR-178, RR-182, RR-219, RR-324, RR-327, RR-333, RR-365, RR-383, RR-411, RR-413, RR-511, RR-545, RR-647, RR-663, RR-675, RR-688, RR-782, RR-806, RR-887.	<p>Concerns raised within Relevant Representations regarding the siting of onshore infrastructure in greenfield land is noted by the Applicant.</p> <p>For clarity, brownfield land is defined as being land that has been previously developed¹⁰ whereas greenfield land is defined as land that is not constrained by existing buildings or infrastructure. The Applicant notes suggestions to use the site of the East Anglia ONE project onshore substation at Bramford for the Project's onshore substation, but highlights that land around the existing East Anglia ONE project onshore substation at Bramford is not defined as brownfield land as it has not previously been developed.</p> <p>The siting of the Project's onshore infrastructure was the outcome of a comprehensive and detailed site selection process, as presented in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). The decision to site the Project in the proposed location is based upon a number of engineering, environmental and commercial factors.</p>

¹⁰ Paragraph 177 of the National Planning Policy Framework (2019), available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf



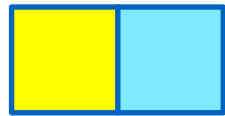
No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Section 4.9.1.2.1 of Chapter 4 Site Selection and Assessment of Alternatives describes the site selection principles for the onshore substations and National Grid infrastructure. With regards to land use and greenfield land, the Applicant has applied the Horlock Rules (see Table 4.4), National Policy Statement (NPS) guidance in NPS EN-1, EN-3 and EN-5 and the Electricity Act 1989 and followed a framework of site selection principles which include:</p> <ul style="list-style-type: none"> • Avoid residential titles (including whole garden) where possible; • Avoid direct significant impacts to internationally and nationally designated areas (e.g. Special Areas of Conservation (SAC), Special protection Areas (SPA), and Sites of Special Scientific Interest (SSSI) etc.); • Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction; • Minimise interaction with mature woodland; and • Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting and land transaction risks associated with interfering with a statutory undertaker and nuclear operator's rights; <p>In addition to the above, a 'target' buffer of 250m from residential properties was applied as a proxy for minimising disturbance to residents. It is recognised that substation locations may encroach into this buffer once a final arrangement is determined, but identifying the buffer during the site selection process enabled the identification of substation zones for further investigation (section 4.9.1.3)</p> <p>The Applicant considered the use of Magnox (Sizewell A) Land for consideration of siting of the onshore substations within the definition of the onshore substations site selection study area as a brownfield site at the request of the local planning</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>authorities. The Applicant engaged with Magnox Limited in an effort to avoid greenfield land. Unfortunately, as outlined in section 4.9.1.2.3, the site was unsuitable. For this reason, brownfield sites (as a potential alternative to greenfield land) on the edge of Leiston were not considered further.</p> <p>Further to the principles above, a desk-based Red-Amber-Green (RAG) methodology was one of the tools used to inform onshore substation site selection across seven potential zones. The RAG assessment (section 3.4 of Appendix 4.2 (APP-443)) considered the following constraints with respect to land use:</p> <ul style="list-style-type: none"> • Presence of residential properties; • Public Rights of Way (ProW) and Nature Trails; • Agricultural Land Classifications; and • Sensitive Land Uses (e.g. schools and hospitals) <p>Please see Appendix 4.2 (APP-433) for further information on the weighting applied to land use considerations against other constraints. With respect to greenfield land, the RAG scoring for Agricultural Land Classifications serves as a useful proxy. Grade 1 land would score a Red, and Grades 2 and 3 would score an Amber. Grades 4 and 5 (including land that did not include an ALC grade, such as brownfield sites) would score a Green.</p> <p>For responses to Relevant Representations in this regard, please also refer to the sections of this document on Site Selection – Landfall (Table 24), Site Selection – Onshore Cable Route (Table 25) and Site Selection – Onshore Substations (Table 26).</p>
003	Onshore cable corridor width	RR-182, RR-630, RR-685.	The Applicant notes some queries raised within Relevant Representations regarding the width of the onshore cable corridor.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>The total width of the onshore cable corridor for both Projects, within which the onshore cable routes for both Projects will be located, is up to 70m. The onshore cable route width for each Project is 32m. A description of the Project's onshore cable route is provided within section 6.7.1 of Chapter 6 Project Description (APP-054), with an explanation of the required cable route width provided in section 6.7.3.1. The proposed route for the onshore cables is approximately 9km long and is shown in Figure 6.2.(APP-097). The primary reason for the onshore cable route width of 32m per project, unless otherwise stated within the draft DCO (APP-023), is to allow enough separation distance between cables to prevent cable overheating, as well as providing sufficient space to ensure safe passage and working room for construction personnel and machinery alongside cable trenches.</p> <p>In some sections the onshore cable route width would vary in order to allow special construction techniques:</p> <ul style="list-style-type: none"> • The typical 32m onshore cable route width would be reduced to 16.1m where the cables cross the woodland to the west of Aldeburgh Road, and if the onshore cable route was to cross the Leiston – Aldeburgh SSSI / Sandlings SPA via trenching (rather than via trenchless) technique. A reduced working width would also be applied when crossing a number of important hedgerows as identified within the DCO. • The typical 32m onshore cable route width would be widened to 90m (underground) if a trenchless technique is utilised to cross the Leiston – Aldeburgh SSSI / Sandlings SPA. This widened onshore cable route is to accommodate the separation distances between each potential HDD bore as it passes under the Leiston – Aldeburgh SSSI / Sandlings SPA. • The typical 32m onshore cable route width would also be widened to 50m for the crossing of the Hundred River. This widened onshore cable route is



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>to accommodate the potential crossing of the Hundred River for construction HGVs, and for potential diversion of the river.</p> <ul style="list-style-type: none">• The typical 32m onshore cable route width would also be widened to a width not to exceed 190m within 418m of the transition bays (associated with the landfall trenchless technique). This widened onshore cable route is to accommodate the onshore cable route from the transition bays to reflect the potentially wider separation between the transition bays, and subsequently narrows to the typical 32m onshore cable route width as the onshore cables converge.



2.12 Landscape - Cable Route

Table 12 Applicant's Comments on Landscape - Cable Route

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General landscape cable route concerns including its location partly within the Area of Outstanding natural Beauty (AONB).	RR-019, RR-022, RR-023, RR-025, RR-045, RR-070, RR-075, RR-077, RR-088, RR-093, RR-100, RR-120, RR-124, RR-125, RR-131, RR-136, RR-138, RR-146, RR-147, RR-159, RR-169, RR-173, RR-177, RR-184, RR-193, RR-195, RR-205, RR-217, RR-223, RR-224, RR-225, RR-230, RR-234, RR-244, RR-245, RR-253, RR-259, RR-260, RR-270, RR-272, RR-277, RR-278, RR-279, RR-292, RR-299, RR-305, RR-308, RR-312, RR-313, RR-319, RR-336, RR-338, RR-340, RR-341, RR-344, RR-357, RR-360, RR-364, RR-367, RR-371, RR-388, RR-393, RR-395, RR-396, RR-399, RR-400, RR-402, RR-403, RR-404, RR-409, RR-417, RR-421, RR-428, RR-431, RR-432, RR-435, RR-442, RR-446, RR-447, RR-449, RR-451, RR-470, RR-473, RR-475, RR-480, RR-484, RR-491, RR-494, RR-500, RR-505, RR-507, RR-509, RR-510, RR-515, RR-524, RR-535, RR-539, RR-555, RR-556, RR-558, RR-559, RR-562, RR-565, RR-574, RR-577, RR-583, RR-593, RR-594, RR-605, RR-616, RR-617, RR-619, RR-625, RR-631, RR-632, RR-633, RR-634, RR-637, RR-639, RR-648, RR-649, RR-654, RR-655, RR-658, RR-669,	<p>The Applicant notes concerns regarding the impacts of the cable route on the landscape and the Area of Outstanding Natural Beauty (AONB).</p> <p>The landscape impact of the cable route construction, specifically its effect on the Estate Sandlands Landscape Character Type and AONB special qualities, is described in section 29.6.1.2 and Appendix 29.3 (APP-567) (Section 29.3.2) of Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>Significant (in EIA terms), short-term, temporary construction stage effects on the landscape/scenic quality and wildness/tranquillity special qualities of Area A (between Thorpeness, Sizewell and Leiston) of the AONB (Figure 29.3 (APP-393)) will primarily be experienced over several separate short 2-3 month periods of peak construction activity and not continuously throughout the construction phase. Over the majority of the construction stage, the relevant section of the onshore cable route will not be subject to these key construction works and the onshore cable route will primarily consist of installed infrastructure and stripped topsoil to be reinstated, during which time the effects on these AONB special qualities are considered not significant in EIA terms due to the limited construction activity. In addition, if the open cut trench methodology is selected as the appropriate method to cross the Sandlings Special Protection Area (SPA) then works will be undertaken outside the breeding bird season. Works will avoid the peak usage periods of the AONB. Given its route primarily through farmland and avoiding features of natural heritage value, the construction of the onshore cable route is assessed as having not significant in EIA terms effects on the natural heritage features of the AONB.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-678, RR-680, RR-682, RR-684, RR-685, RR-691, RR-693, RR-694, RR-695, RR-696, RR-706, RR-713, RR-714, RR-727, RR-728, RR-730, RR-734, RR-735, RR-736, RR-741, RR-747, RR-748, RR-749, RR-752, RR-756, RR-768, RR-778, RR-789, RR-790, RR-794, RR-798, RR-800, RR-801, RR-803, RR-814, RR-817, RR-821, RR-823, RR-827, RR-834, RR-835, RR-837, RR-839, RR-841, RR-846, RR-851, RR-852, RR-857, RR-859, RR-863, RR-868, RR-871, RR-873, RR-877, RR-879, RR-880, RR-891, RR-898, RR-902, RR-904, RR-907, RR-909, RR-910, RR-911, RR-912, RR-916, RR-918.	<p>After exiting the AONB, the onshore cable route then takes a route which runs parallel to the western edge of the AONB between Leiston and Aldringham. In this area, outside the AONB, there will be no direct effects from construction of the onshore cable route on the landscape elements/physical features of the AONB (Area B – between Thorpeness, Aldeburgh and Snape). There will be no significant effects (in EIA terms) on the landscape and scenic quality of the setting, relative wildness, tranquillity, natural and cultural heritage features of the AONB as a result of visibility of the construction of the onshore cable route when it is in close proximity to the AONB boundary.</p> <p>To the south of Aldringham, the onshore cable route extends west away from the coastal areas of the AONB towards the onshore substation, becoming increasingly distant from the coastal part of the AONB, while running parallel to, and approximately 1km north of the area of AONB covering the River Alde estuary. The construction of the onshore cable route over this section will have no significant effects on the special qualities of the AONB.</p> <p>The effect of the onshore cable route during construction is therefore only assessed as having significant (in EIA terms), short-term and temporary effects on the character of the AONB within a localised area of the onshore cable route between Thorpeness, Sizewell and Leiston (Area A) but is assessed as not significant (in EIA terms), short-term and temporary on the wider AONB within the LVIA study area (Areas B and C (between Sizewell and Dunwich Forest)).</p> <p>It is anticipated that once operational, the potential effects of the landfall and onshore cable route would be not significant in EIA terms due to their presence underground. The assessment of these components during the operational phase has been scoped out of the LVIA, as agreed through the scoping process, with the exception of the removal of woodland to the west of Aldeburgh Road to facilitate the onshore cable route crossing of Aldeburgh Road (B1122) (see Table 33 for</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			more information on impacts to woodland) which is assessed as an operational impact in section 29.6.2.1.1 of Chapter 29 Landscape and Visual Impact Assessment .
002	Length of cable route, its direction and its (and construction consolidation sites (CCSs)) proximity to properties	RR-045, RR-075, RR-077, RR-088, RR-093, RR-099, RR-116, RR-121, RR-125, RR-132, RR-138, RR-140, RR-146, RR-165, RR-171, RR-173, RR-177, RR-183, RR-193, RR-194, RR-195, RR-197, RR-199, RR-205, RR-215, RR-217, RR-222, RR-223, RR-224, RR-225, RR-231, RR-234, RR-235, RR-243, RR-244, RR-260, RR-270, RR-272, RR-278, RR-279, RR-280, RR-289, RR-292, RR-294, RR-296, RR-299, RR-301, RR-305, RR-308, RR-310, RR-315, RR-318, RR-319, RR-325, RR-327, RR-338, RR-328, RR-330, RR-336, RR-339, RR-340, RR-341, RR-342, RR-350, RR-353, RR-357, RR-360, RR-364, RR-365, RR-369, RR-373, RR-375, RR-386, RR-387, RR-388, RR-392, RR-393, RR-395, RR-396, RR-399, RR-400, RR-403, RR-417, RR-421, RR-428, RR-443, RR-446, RR-447, RR-449, RR-452, RR-458, RR-473, RR-475, RR-484, RR-487, RR-488, RR-491, RR-494, RR-495, RR-499, RR-500, RR-505, RR-507, RR-508, RR-509, RR-510, RR-515, RR-518, RR-524, RR-525, RR-529, RR-535, RR-536, RR-539, RR-545, RR-547, RR-555, RR-558, RR-559, RR-562, RR-574, RR-577, RR-586, RR-594, RR-596,	<p>The Applicant notes queries raised within Relevant Representations regarding the proximity of the cable route and CCSs to properties.</p> <p>The location and length of the onshore cable corridor is driven by the location of the onshore substation (section 4.9.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)) and the location of the landfall (section 4.8 of Chapter 4 Site Selection and Assessment of Alternatives). The proposed route for the onshore cables is approximately 9km long and is shown in Figure 6.2 (APP-097).</p> <p>The onshore cable corridor routeing has followed the same framework of site selection principles as the onshore substation. These are described in section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives and include minimising disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction. These same principles informed the Applicant's decision for the onshore cable route to cross the Sandlings SPA at its narrowest point, towards the north of the SPA. At this location the Applicant has committed to a reduced onshore cable route working width of 16.1m (reduced from 32m) within the SPA to minimise habitat loss (see section 22.6.1.1.2 of Chapter 22 Onshore Ecology).</p> <p>A detailed explanation of the principle drivers of the onshore cable route siting, including consideration of residential properties, brownfield sites, ecological receptors, recreation and tourism, landscape, traffic and land use is addressed in Table 25.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-598, RR-605, RR-616, RR-617, RR-621, RR-624, RR-625, RR-633, RR-649, RR-655, RR-664, RR-665, RR-674, RR-678, RR-684, RR-685, RR-691, RR-693, RR-694, RR-695, RR-698, RR-706, RR-727, RR-728, RR-734, RR-736, RR-748, RR-749, RR-753, RR-754, RR-755, RR-756, RR-761, RR-762, RR-764, RR-766, RR-768, RR-770, RR-771, RR-772, RR-778, RR-782, RR-783, RR-786, RR-789, RR-790, RR-793, RR-795, RR-798, RR-801, RR-803, RR-814, RR-821, RR-823, RR-827, RR-829, RR-837, RR-841, RR-843, RR-851, RR-852, RR-859, RR-862, RR-863, RR-865, RR-868, RR-871, RR-873, RR-877, RR-879, RR-884, RR-885, RR-887, RR-889, RR-890, RR-891, RR-893, RR-896, RR-902, RR-904, RR-906, RR-907, RR-909, RR-911, RR-912, RR-916, RR-918, RR-919.	
003	Adequacy of landscape mitigation	RR-045, RR-065, RR-070, RR-075, RR-077, RR-088, RR-093, RR-121, RR-132, RR-138, RR-140, RR-146, RR-149, RR-171, RR-183, RR-193, RR-195, RR-199, RR-205, RR-214, RR-215, RR-217, RR-222, RR-224, RR-225, RR-234, RR-243, RR-244, RR-260, RR-272, RR-280, RR-328, RR-330, RR-339, RR-341, RR-342, RR-365, RR-369, RR-373, RR-388, RR-399, RR-417, RR-421, RR-428, RR-487, RR-499, RR-505, RR-510, RR-515, RR-524,	<p>The Applicant notes comments within the Relevant Representations regarding the adequacy of landscape mitigation. The Applicant considers the landscape mitigation proposed to be appropriate.</p> <p>As described in section 3.4 of the Outline Landscape and Ecological Mitigation Strategy (OLEMS) (APP-584) detailed consultation has been undertaken with the relevant statutory nature conservation body (i.e. Natural England) on landscape mitigation for the onshore cable route.</p> <p>The landscape and ecological mitigation proposals for the onshore elements of the design including the cable route are presented within the OLEMS which was</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-525, RR-535, RR-539, RR-545, RR-547, RR-577, RR-594, RR-596, RR-639, RR-640, RR-664, RR-669, RR-674, RR-678, RR-680, RR-684, RR-693, RR-698, RR-713, RR-714, RR-734, RR-741, RR-748, RR-751, RR-753, RR-755, RR-762, RR-782, RR-783, RR-823, RR-824, RR-829, RR-835, RR-837, RR-846, RR-849, RR-851, RR-852, RR-887, RR-889, RR-890, RR-906, RR-909, RR-911, RR-912.	<p>submitted with the application (see section 29.3.3.1 of Chapter 29 Landscape and Visual Impact Assessment (APP-077). A final detailed Landscape Management Plan (LMP) will be approved by the Local Planning Authority post-consent in order to discharge the relevant DCO requirements, prior to construction and will be in accordance with the OLEMS.</p> <p>Examples of proposed mitigation measures for the onshore cable route include:</p> <ul style="list-style-type: none"> • Reinstatement of the land at the end of the construction phase. • Where the onshore cable route crosses an important hedgerow, the onshore cable route will be reduced to the minimal working width (16.1m where possible) thus minimising the total length of important hedgerow removed. • Along the length of the onshore cable route, no 24-hour lighting is anticipated to be required except that associated with trenchless technique operations and security lighting at the CCSs. Task lighting will be utilised in localised areas where required. <p>The Applicant considers that the landscape mitigation measures proposed are robust and appropriate to reduce potential impacts as far as practicable.</p>



2.13 Landscape – Substations

Table 13 Applicant's Comments on Landscape - Substations

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General landscape substation concerns.	RR-019, RR-023, RR-025, RR-027, RR-044, RR-069, RR-075, RR-077, RR-080, RR-088, RR-093, RR-094, RR-106, RR-107, RR-115, RR-120, RR-124, RR-129, RR-132, RR-133, RR-134, RR-137, RR-138, RR-140, RR-141, RR-145, RR-148, RR-149, RR-155, RR-163, RR-167, RR-169, RR-171, RR-176, RR-177, RR-178, RR-183, RR-184, RR-192, RR-193, RR-194, RR-195, RR-196, RR-197, RR-199, RR-200, RR-203, RR-204, RR-208, RR-210, RR-212, RR-215, RR-217, RR-219, RR-221, RR-222, RR-225, RR-230, RR-233, RR-234, RR-236, RR-238, RR-243, RR-245, RR-246, RR-253, RR-260, RR-267, RR-268, RR-271, RR-280, RR-300, RR-301, RR-302, RR-308, RR-310, RR-312, RR-320, RR-323, RR-328, RR-330, RR-332, RR-333, RR-335, RR-338, RR-339, RR-344, RR-346, RR-348, RR-351, RR-352, RR-361, RR-365, RR-366, RR-367, RR-369, RR-370, RR-373, RR-374, RR-375,	<p>The Applicant notes queries raised in Relevant Representations regarding the landscape impacts of the onshore substation and National Grid substation.</p> <p><u>Background</u></p> <p>One substation is required for the Project together with one National Grid substation. It is proposed that they will be sited adjacent to each other.</p> <p>The purpose of the onshore substation is to convert the electrical current from HVAC cables into appropriate voltage for the National Grid substation to connect into the national electricity grid.</p> <p>From the outset, careful siting of the onshore substation and National Grid substation has set out to avoid key areas of sensitivity wherever possible. As described in section 4.9.1.3 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) and Table 26 this includes an initial target buffer of 250m from residential properties being applied as a proxy for minimising disturbance to residents. It is recognised that substation locations may encroach into this buffer once a final arrangement is determined.</p> <p>Embedded landscape mitigation has included:</p> <ul style="list-style-type: none"> Careful siting of the onshore substation (and National Grid substation) to the west and south of existing woodland blocks to gain maximum benefit from existing screening; Careful siting of the onshore substation and National Grid substation in close proximity to the existing overhead lines to reduce additional cabling requirements and to minimise proliferation of infrastructure; and



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-376, RR-377, RR-383, RR-386, RR-388, RR-393, RR-395, RR-397, RR-404, RR-408, RR-417, RR-421, RR-423, RR-428, RR-432, RR-442, RR-445, RR-446, RR-447, RR-448, RR-449, RR-451, RR-471, RR-475, RR-479, RR-480, RR-481, RR-482, RR-487, RR-495, RR-500, RR-506, RR-508, RR-509, RR-511, RR-513, RR-527, RR-529, RR-535, RR-539, RR-543, RR-556, RR-562, RR-564, RR-565, RR-566, RR-567, RR-568, RR-574, RR-583, RR-586, RR-589, RR-593, RR-594, RR-595, RR-597, RR-598, RR-604, RR-606, RR-616, RR-623, RR-631, RR-632, RR-633, RR-637, RR-640, RR-642, RR-649, RR-654, RR-655, RR-659, RR-663, RR-664, RR-666, RR-668, RR-674, RR-676, RR-677, RR-678, RR-679, RR-680, RR-686, RR-687, RR-690, RR-693, RR-698, RR-713, RR-714, RR-716, RR-718, RR-722, RR-725, RR-730, RR-733, RR-734, RR-736, RR-741, RR-743, RR-744, RR-747, RR-748, RR-759, RR-760, RR-761,	<ul style="list-style-type: none"> Siting the onshore substation and National Grid substation in an area of low flood risk (Flood Zone 1). <p>Further detail on the implementation and micro-siting of the onshore substation is provided within the <i>Scheme Implementation Report</i> (APP-596).</p> <p><u>Landscape and Visual Impacts from the Project and National Grid Substations</u></p> <p>The potential landscape and visual impacts of the onshore substation and National Grid infrastructure during construction and operation are assessed in full in Appendix 29.3 (APP-393) and 29.4 (APP-394) and summarised in Table 29.9 of Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p><u>Landscape and Visual Impacts during Construction</u></p> <p>Potential landscape and visual impacts during construction of the onshore substation and national grid infrastructure are assessed in sections 29.6.1.3.1 and 29.6.1.3.2 of Chapter 29 Landscape and Visual Impact Assessment respectively and summarised below.</p> <p>The construction of the onshore substation and National Grid infrastructure will have no significant effects (in EIA terms) on the character or special qualities of the AONB¹¹. The onshore substation and National Grid infrastructure are located outside the AONB and its immediate setting, approximately 1.6km to the north of the AONB at its closest point (where the AONB covers the estuary of the River Alde) and 3.7km to the west of the edge of the main 'coastal' area of the AONB (near Aldringham (Area A)). The special qualities of the AONB will not be subject to change as a result of the construction of the onshore substation and National Grid infrastructure, primarily due the distance of the construction of the onshore substation and National Grid infrastructure from the AONB, their limited visibility</p>

¹¹ EDF Energy, Suffolk Coast and Heaths AONB Partnership, Suffolk County Council, Suffolk Coastal District Council and Waveney District Council (2016) Suffolk Coast and Heaths AONB - Natural Beauty and Special Qualities Indicators



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-762, RR-767, RR-769, RR-770, RR-773, RR-781, RR-782, RR-783, RR-787, RR-794, RR-795, RR-796, RR-799, RR-804, RR-809, RR-813, RR-814, RR-815, RR-816, RR-818, RR-819, RR-821, RR-823, RR-828, RR-829, RR-832, RR-834, RR-837, RR-839, RR-846, RR-849, RR-851, RR-852, RR-857, RR-859, RR-862, RR-868, RR-871, RR-873, RR-880, RR-884, RR-885, RR-886, RR-887, RR-888, RR-889, RR-890, RR-891, RR-893, RR-896, RR-897, RR-898, RR-902, RR-904, RR-906, RR-908, RR-909, RR-910, RR-911, RR-912.	<p>from within the AONB and the lack of any changes to the pattern of elements within AONB.</p> <p>The existing landscape at the substation location provides screening and restricts the extent of visibility of the substation from the viewpoints assessed. However, despite this, the construction of the onshore substation and National Grid infrastructure are assessed as having significant (in EIA terms) visual effects on residents of localised areas on the edges of Friston (not from Friston as a whole), as represented by Viewpoints 1, 2, 4, and 9; people walking on the local public right of way network to the north of Friston (between Friston and Fristonmoor) as represented by Viewpoints 2 and 5; residents of scattered rural dwellings near Friston, as represented by Viewpoints 5 and 8; motorists travelling on the B1121 Saxmundham Road, to the north of Friston, as represented by Viewpoint 8; and motorists/cyclists travelling on Grove Road immediately passing the onshore substation and National Grid substation, between Friston and Grove Wood/Manor Farm, as represented by Viewpoint 14.</p> <p>These significant (in EIA terms) visual effects would all occur within approximately 1.2km of the onshore substation and National Grid substation, making them localised, and they will also occur temporarily over the short-term, during the construction period. These significant (in EIA terms) visual effects occur where the construction of the onshore substation and National Grid infrastructure will be visible at relatively close distances, generally resulting in medium to high changes to views, due to the size, extent and close proximity of the onshore substation, National Grid infrastructure and construction consolidation sites (CCS), together with fencing, access road, vehicles, machinery, cranes, accommodation and the stockpiling of subsoil/topsoil needed during the construction period. During the construction period, the built form of the onshore substation and National Grid infrastructure will take shape during the construction and installation. With progress through the construction period,</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>the built forms of the constructed infrastructure will increase the influence of buildings and infrastructure, such that electrical infrastructure becomes one of the prevailing features of these views.</p> <p><u>Landscape and Visual Impacts during Operation</u></p> <p>Potential landscape and visual impacts during operation of the onshore substation and national grid infrastructure are assessed in sections 29.6.2.2.1 and 29.6.2.2.2 of Chapter 29 Landscape and Visual Impact Assessment (APP-077) respectively and summarised below.</p> <p>Significant (in EIA terms) effects on the character of the landscape are assessed as occurring within a localised area of approximately 1km around the onshore substation and National Grid infrastructure. The presence of the onshore substation and National Grid infrastructure will result in a large-scale change to the local character of this area of approximately 1km around the onshore substation and National Grid infrastructure within the Friston area of the Ancient Estate Claylands landscape character type (LCT) (01).</p> <p>Significant (in EIA terms) effects on the perceived landscape character of the Estate Sandlands LCT also occur from a localised area within 1km of the National Grid substation, mainly to the south and west, where the effects on the character of this LCT are more readily experienced (compared to areas to the east and south-east, which benefit from substantial intervening screening). At the local level, the character of the Estate Sandlands LCT is not readily differentiated from the Ancient Estate Claylands LCT, with the local areas to the north of Friston forming a distinct and consistent landscape setting. The onshore substation and National Grid substation would exert a locally characterising effect in these areas in close proximity to the site, however moving outwards and away from the site, they would exert a reduced effect upon landscape character</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>where the surrounding landscape will increase in characterising influence, reasserting its overall baseline influence on character further afield.</p> <p>The operation of the onshore substation and National Grid infrastructure will have no significant (in EIA terms) effects on the character or special qualities of the AONB. The onshore substation and National Grid infrastructure are located outside the AONB and its immediate setting, approximately 1.6 km to the north of the AONB at its closest point (where the AONB covers the estuary of the River Alde) and 3.7 km to the west of the edge of the main 'coastal' area of the AONB (near Aldringham (Area A)). The special qualities of the AONB will not be subject to change as a result of the operation of the onshore substation and National Grid infrastructure due the distance of the onshore substation and National Grid infrastructure from the AONB and their limited visibility from within the AONB.</p> <p>Despite the notable screening provided in the local landscape, the operation of the onshore substation and National Grid infrastructure are assessed as having significant (in EIA terms) visual effects on residents of parts of Friston, as represented by Viewpoints 1, 2, and 9; people walking on the local public right of way network to the north of Friston (between Friston and Fristonmoor) as represented by Viewpoints 2, 5; residents of scattered rural dwellings near Friston, as represented by Viewpoints 5 and 8; and motorists/cyclists travelling on Grove Road immediately passing the onshore substation and National Grid infrastructure, between Friston and Grove Wood/Manor Farm, as represented by Viewpoint 14 Grove Road. Photomontage visualisations showing the predicted views of the onshore substation and National Grid infrastructure during the first year of the operational phase are shown in Figures 29.13 – 29.26 (APP-404 to APP-417).</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>These significant (in EIA terms) visual effects would all occur within approximately 1.2km of the onshore substation and National Grid infrastructure, making them localised and they will also occur over the long-term, during a 10 to 15 year period until areas of woodland planted as part of the landscape mitigation plan (Figure 29.11a-b (APP-401 and APP402) and Figure 29.12 (APP-403)) are expected to provide effective screening. Woodland trees either planted as part of the onshore site preparation works planting or at the end of the construction phase, will be present and are assumed to be establishing with good vigour, increasingly having an influence during the operational period, but will have limited influence as landscape components/screening features in the early stages of the operational period.</p> <p>These significant (in EIA terms) localised visual effects occur where the operational onshore substation and National Grid infrastructure will be visible at relatively close distances within approximately 1.2km, resulting in medium to high magnitudes of change to views, due to the size, extent and close proximity of the onshore substation and National Grid infrastructure, together with fencing, access road and vehicles during the operational period. During the early part of the operational period, the complex built form of the onshore substation and National Grid infrastructure will have a prevailing or notable influence in these views from the local area. The National Grid overhead realignment works will also change the appearance of the overhead line and pylons in views, consisting of one new pylon and the modification or replacement of up to three existing pylons, and the diversion of the northern overhead line route. The sealing end compounds will also be visible, particularly in views from the north, allowing the existing 400kV overhead electrical conductors (wires) to be brought down from the pylons up to four new sealing end compounds and then connected via underground cable to the National Grid substation.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p><u>Summary of Significance of Effects (15 years post construction with embedded mitigation)</u></p> <p>Section 29.6.2.2.3 of Chapter 29 Landscape and Visual Impact Assessment</p> <p>The potential landscape and visual effects of the onshore substation and National Grid infrastructure during the operational period are assessed in full in Appendix 29.3 (APP-567) and 29.4 (APP-568) and summarised in Table 29.10 of the chapter. The effects during the operation of the onshore substation and National Grid substation for each of the assessed receptors are summarised in Table 29.10 of the chapter at the first year of the operational phase and the residual effects with embedded mitigation at 15 years post construction, when the landscape mitigation described in section 29.3.3.1 of the chapter is predicted to provide effective screening.</p> <p><u>Cumulative Landscape Impacts</u></p> <p>The approach to assessing cumulative landscape impacts is discussed in Table 5.</p>
002	Landscape mitigation, growth rates of mitigation planting etc.	RR-027, RR-069, RR-077, RR-080, RR-088, RR-093, RR-094, RR-107, RR-115, RR-124, RR-129, RR-132, RR-133, RR-134, RR-138, RR-140, RR-141, RR-145, RR-148, RR-167, RR-169, RR-171, RR-176, RR-177, RR-178, RR-183, RR-184, RR-192, RR-193, RR-194, RR-195, RR-196, RR-197, RR-199, RR-200, RR-204, RR-208, RR-210, RR-212, RR-215, RR-217, RR-219, RR-222, RR-225,	<p>The Applicant notes queries raised in Relevant Representations regarding the effectiveness of landscape mitigation.</p> <p>An Outline Landscape and Ecological Management Strategy (OLEMS) (APP-584) has been submitted with the application. The OLEMS summarises the general landscape and ecology principles and outlines the requirement for landscape and ecological mitigation measures that are reflective of the surveys and impact assessment carried out for the onshore infrastructure of the Project.</p> <p>A final detailed written Landscape Management Plan (LMP) and Ecological Management Plan (EMP) will be produced post-consent. Requirement 14 of the draft DCO (APP-023) provides that no stage of the onshore works may</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-230, RR-233, RR-234, RR-236, RR-238, RR-243, RR-245, RR-253, RR-260, RR-271, RR-280, RR-300, RR-301, RR-302, RR-310, RR-312, RR-320, RR-323, RR-328, RR-330, RR-332, RR-333, RR-335, RR-338, RR-352, RR-361, RR-365, RR-366, RR-367, RR-369, RR-370, RR-373, RR-374, RR-375, RR-376, RR-377, RR-383, RR-386, RR-388, RR-393, RR-395, RR-404, RR-408, RR-417, RR-421, RR-423, RR-428, RR-432, RR-442, RR-445, RR-446, RR-447, RR-448, RR-449, RR-451, RR-471, RR-473, RR-475, RR-479, RR-480, RR-481, RR-482, RR-487, RR-495, RR-500, RR-506, RR-508, RR-509, RR-511, RR-513, RR-527, RR-529, RR-535, RR-539, RR-543, RR-556, RR-562, RR-564, RR-565, RR-567, RR-568, RR-574, RR-586, RR-593, RR-594, RR-595, RR-597, RR-598, RR-604, RR-606, RR-616, RR-623, RR-631, RR-632, RR-633, RR-637, RR-642, RR-649, RR-654, RR-655, RR-659, RR-663, RR-664, RR-666, RR-668, RR-674, RR-676, RR-677, RR-678, RR-679, RR-680, RR-690, RR-693, RR-698, RR-713, RR-714,	<p>commence until for that stage an LMP and associated work programme (which accords with the OLEMS and includes details of the ongoing maintenance and management of the landscaping works) has been approved by the relevant planning authority. Requirement 15 of the draft DCO states that all landscaping works must then be carried out in accordance with the approved LMP. Similarly, Requirement 21 of the draft DCO provides that no stage of the onshore works may commence until for that stage an EMP (which accords with the OLEMS) has been approved by the relevant planning authority in consultation with the relevant statutory nature conservation body.</p> <p>Through submission and approval of the final LMP and EMP, it can be assured that ecological management and provision of landscaping associated with the construction of the onshore infrastructure will be formally controlled and implemented.</p> <p>As described in section 3.4 of the OLEMS, detailed consultation has been undertaken with the relevant SNCBs on landscape mitigation for the onshore project and national grid substations.</p> <p>Initially, the Local Planning Authority, Natural England and Historic England have provided comments on the Outline Landscape Mitigation Plan (OLMP) originally presented within the Preliminary Environmental Information Report (PEIR) via a series of technical working group meetings in addition to the LVIA Expert Topic Group (ETG) consultation. These comments allowed the further refinement of the OLMP which is presented within the OLEMS and incorporated within the outline design principles in section 3.3 of the OLEMS.</p> <p>The LVIA ETG and technical working group has been engaged on a regular basis to discuss and agree the arrangement, layout, reinstatement of the historic landscape, PRoW permanent diversions, planting specification, planting species</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-722, RR-725, RR-730, RR-733, RR-734, RR-736, RR-741, RR-743, RR-744, RR-747, RR-748, RR-759, RR-760, RR-761, RR-762, RR-764, RR-767, RR-770, RR-773, RR-776, RR-781, RR-782, RR-783, RR-785, RR-787, RR-794, RR-795, RR-796, RR-804, RR-814, RR-815, RR-816, RR-818, RR-819, RR-821, RR-823, RR-828, RR-829, RR-832, RR-834, RR-837, RR-839, RR-849, RR-851, RR-852, RR-862, RR-884, RR-885, RR-887, RR-888, RR-893, RR-904, RR-906, RR-908, RR-909, RR-911, RR-912.	<p>and growth rates of the OLMP for the Projects with meetings on the 24th January, 22nd February, 3rd April and 23rd May all 2019.</p> <p>In accordance with the requirements of the draft DCO (APP-023), prior to construction, a LMP for each stage of the works would be produced to include details of all proposed hard and soft landscaping works, including:</p> <ul style="list-style-type: none"> • Location, number, species, size and density of any proposed planting, including any trees. • Cultivation, importing of materials, protection, and weed control to ensure plant establishment. • Proposed finished heights, form and gradient of any potential earthworks. • Hard surfacing materials. • Details of existing trees and hedges to be retained with measures for their protection during the construction period. • Retained historic landscape features such as ditches, banks and hedgerows and proposals for restoration, where relevant. • Implementation timetables for all landscaping works. • Soil retention, handling and protection. • The provision of a scheme of sustainable drainage will be integrated into the details of landscaping works at the onshore substation and National Grid infrastructure. • Integration of relevant sections of substation design principles. <p>Section 3.5.4 of the OLEMS provides information on the assumed growth rates. The early years of growth, young trees will be establishing, and are assumed to have good vigour, but likely to have limited screening effects in the landscape. Woodland planted areas are assumed to be well established between 5 to 10</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>years post-planting, with young trees growing in height, having increasing landscape significance and providing some screening of the onshore substations. Between 10 to 15 years post-planting, fully established trees are assumed to be generally retaining good vigour and starting to achieve good height with tree crowns spreading and are assumed to provide notable screening of the onshore substations and National Grid infrastructure.</p> <p>Heights of trees at 15 years post-planting are estimated in paragraph 82 of the OLEMS with ranges given for the different proposed types of trees to be planted.</p>
003	Size of the substation	RR-027, RR-042, RR-069, RR-070, RR-077, RR-080, RR-088, RR-089, RR-093, RR-094, RR-095, RR-096, RR-098, RR-100, RR-102, RR-105, RR-106, RR-107, RR-115, RR-124, RR-125, RR-128, RR-129, RR-132, RR-133, RR-134, RR-136, RR-138, RR-140, RR-141, RR-143, RR-146, RR-148, RR-160, RR-165, RR-166, RR-167, RR-169, RR-170, RR-171, RR-173, RR-174, RR-176, RR-177, RR-178, RR-181, RR-183, RR-184, RR-192, RR-193, RR-194, RR-195, RR-196, RR-197, RR-199, RR-200, RR-202, RR-204, RR-208, RR-210, RR-212, RR-214, RR-215, RR-217, RR-219, RR-222, RR-223, RR-224, RR-225, RR-230, RR-231, RR-233, RR-234, RR-236, RR-238, RR-239,	<p>The Applicant notes queries raised in Relevant Representations regarding the size of the onshore substation.</p> <p>The maximum size of the key onshore substation parameters is provided in Table 6.27 of Chapter 6 Project Description (APP-054). The onshore substation will use Gas Insulated Switchgear (GIS) technology. As described in section 6.7.9.1.1 of Chapter 6 Project Description (APP-054), the National Grid substation will either be an Air Insulated Switchgear (AIS), or a GIS depending on the technology employed. Within an AIS substation, equipment is designed to be left open to the elements and cooled by ambient air temperature. Within a GIS substation, equipment is designed to be insulated and cooled by a pressurised gas. The parameters for the AIS and GIS National Grid substation are described in Table 6.28 and Table 6.29 respectively. The appropriate worst case is identified and assessed in Chapter 29 Landscape and Visual Impact Assessment (APP-077) for the National Grid substation.</p> <p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains that the Project is based on a project design envelope (or 'Rochdale Envelope') approach. This involves definition of a range of parameters that enables the assessment of each impact to be conducted based on design parameters likely to result in the maximum adverse effect (i.e. the worst case scenario). It is recognised by the</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-240, RR-241, RR-243, RR-244, RR-245, RR-249, RR-252, RR-253, RR-258, RR-260, RR-262, RR-262, RR-263, RR-271, RR-272, RR-276, RR-277, RR-278, RR-279, RR-280, RR-281, RR-284, RR-295, RR-298, RR-299, RR-300, RR-301, RR-302, RR-305, RR-308, RR-310, RR-312, RR-315, RR-319, RR-320, RR-322, RR-323, RR-324, RR-326, RR-328, RR-330, RR-332, RR-333, RR-335, RR-336, RR-337, RR-338, RR-339, RR-342, RR-350, RR-353, RR-357, RR-358, RR-359, RR-361, RR-364, RR-365, RR-366, RR-368, RR-369, RR-370, RR-373, RR-374, RR-375, RR-376, RR-377, RR-378, RR-383, RR-386, RR-387, RR-388, RR-389, RR-390, RR-392, RR-393, RR-395, RR-398, RR-400, RR-402, RR-403, RR-404, RR-408, RR-416, RR-417, RR-421, RR-423, RR-426, RR-427, RR-428, RR-429, RR-432, RR-433, RR-434, RR-435, RR-437, RR-443, RR-445, RR-447, RR-448, RR-449, RR-450, RR-451, RR-452, RR-454, RR-456, RR-458, RR-464, RR-467, RR-468, RR-470, RR-471, RR-472, RR-474, RR-475, RR-476, RR-477,	<p>Planning Inspectorate Advice Note Nine that, at the time of submitting an application, offshore wind developers may not know the precise nature and arrangement of infrastructure and associated infrastructure that make up the proposed development. The Rochdale Envelope approach provides flexibility that is important to the Project as it prevents consent being granted for specific infrastructure or a particular layout which is not optimal or efficient at the time of construction.</p> <p>The physical footprint of the onshore substation and National Grid substation is determined by:</p> <ul style="list-style-type: none"> • Feasible technology (e.g. AC or DC transmission); • The size of infrastructure (e.g. the size of cables, size of building or equipment) which is determined by technology; • The number of each element required (e.g. cables, transformers, etc.); • Minimum spacings required for safe and efficient construction and operation (e.g. cable spacing); • AIS or GIS technology (relevant to National Grid substation only) • Required stand-offs or crossing requirements (e.g. to other infrastructure or watercourses); • Other constraints (e.g. hard constraints or required buffers from human or environmental constraints), topography and natural features; • Construction methodology (e.g. open trench or trenchless techniques) and construction sequencing which is dependent upon constraints; • Access and storage (including spoil);



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-479, RR-480, RR-482, RR-487, RR-491, RR-492, RR-494, RR-495, RR-497, RR-498, RR-499, RR-504, RR-508, RR-509, RR-510, RR-511, RR-513, RR-522, RR-524, RR-527, RR-528, RR-531, RR-534, RR-535, RR-536, RR-540, RR-541, RR-543, RR-545, RR-546, RR-552, RR-555, RR-556, RR-558, RR-561, RR-565, RR-567, RR-568, RR-570, RR-574, RR-577, RR-581, RR-586, RR-587, RR-593, RR-594, RR-595, RR-597, RR-598, RR-604, RR-605, RR-606, RR-610, RR-616, RR-617, RR-619, RR-621, RR-623, RR-624, RR-625, RR-626, RR-628, RR-631, RR-632, RR-633, RR-637, RR-642, RR-647, RR-648, RR-649, RR-651, RR-652, RR-653, RR-654, RR-655, RR-658, RR-659, RR-662, RR-663, RR-664, RR-670, RR-674, RR-676, RR-677, RR-679, RR-680, RR-682, RR-685, RR-690, RR-691, RR-693, RR-694, RR-696, RR-698, RR-701, RR-702, RR-706, RR-710, RR-711, RR-713, RR-714, RR-715, RR-719, RR-721, RR-722, RR-724, RR-725, RR-727, RR-730, RR-736, RR-741, RR-743, RR-746, RR-748, RR-749, RR-751,	<ul style="list-style-type: none"> • Drainage; and • Welfare and security. <p>The maximum size of the key onshore substation parameters are provided in Table 6.27 of Chapter 6 Project Description (APP-054). The project design envelope has a reasoned maximum extent for a number of key parameters. The final design would lie within the maximum extent of the consent sought. Post consent, the Applicant would design the onshore substation to the capacity of electricity required to be converted and to accommodate the technology at that time which is economically available from the supply chain. Furthermore, the final design of the onshore substation and National Grid substation, including the layout, scale and external appearance, is required to be approved by the LPA before any work on the substation commences as per Requirement 12 of the draft DCO (APP-023).</p> <p>Section 4 of the Outline Onshore Substation Design Principles Statement (APP-585) states that based on preliminary engineering design undertaken, the finished ground level in respect of the onshore substation is anticipated to be approximately 21.4m above ordnance datum (AOD) where the onshore substation is located in the eastern area of Work No. 30, and approximately 19.8m AOD where the onshore substation is located in the western area of Work No. 30. The final finished ground level will be established during detailed design post consent. This is based on:</p> <ul style="list-style-type: none"> • Surface water drainage design requirements, to ensure adequate surface water run-off from the onshore substation and a suitable connection to the existing surface water drainage system at Church Road;



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-754, RR-756, RR-757, RR-759, RR-760, RR-761, RR-762, RR-766, RR-767, RR-770, RR-771, RR-772, RR-773, RR-775, RR-779, RR-780, RR-781, RR-782, RR-783, RR-786, RR-789, RR-790, RR-794, RR-796, RR-798, RR-801, RR-802, RR-803, RR-804, RR-811, RR-814, RR-815, RR-816, RR-817, RR-818, RR-819, RR-821, RR-823, RR-827, RR-828, RR-829, RR-832, RR-834, RR-837, RR-839, RR-840, RR-841, RR-850, RR-851, RR-852, RR-862, RR-863, RR-865, RR-866, RR-874, RR-876, RR-877, RR-879, RR-883, RR-884, RR-885, RR-887, RR-888, RR-893, RR-904, RR-906, RR-908, RR-909, RR-911, RR-912, RR-913, RR-915, RR-916, RR-918, RR-919.	<ul style="list-style-type: none"> Existing ground levels and practicable cut and fill requirements, to optimise the cut and fill balance of the onshore substation and minimise the need to import or export spoil material during the onshore substation construction; and Groundwater constraints, to ensure appropriate management and control of groundwater interactions in the design of the onshore substation. <p>Ground levels will be reduced in parts of the onshore substation / National Grid substation in order to achieve an appropriate finished floor level whilst maintaining the integrity of the surface water drainage system.</p>



2.14 Lighting Requirements

Table 14 Applicant's Comments on Lighting Requirements

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Lighting during Construction	RR-027, RR-043, RR-069, RR-093, RR-116, RR-133, RR-139, RR-140, RR-144, RR-148, RR-151, RR-169, RR-171, RR-174, RR-184, RR-195, RR-198, RR-200, RR-204, RR-208, RR-213, RR-214, RR-241, RR-242, RR-258, RR-261, RR-277, RR-280, RR-281, RR-302, RR-315, RR-320, RR-327, RR-338, RR-339, RR-350, RR-354, RR-366, RR-369, RR-380, RR-383, RR-386, RR-388, RR-400, RR-416, RR-429, RR-433, RR-442, RR-443, RR-445, RR-447, RR-451, RR-459, RR-462, RR-472, RR-473, RR-474, RR-487, RR-492, RR-494, RR-500, RR-504, RR-509, RR-534, RR-541, RR-546, RR-552, RR-581, RR-593, RR-598, RR-605, RR-610, RR-621, RR-634, RR-640, RR-644, RR-649, RR-651, RR-666, RR-690, RR-695, RR-709, RR-713, RR-714, RR-760, RR-761, RR-762, RR-764, RR-772, RR-775, RR-782, RR-783, RR-795, RR-797, RR-811, RR-814, RR-815, RR-816, RR-818, RR-819, RR-821, RR-829, RR-834, RR-840, RR-847, RR-851, RR-852, RR-864, RR-873, RR-890, RR-901, RR-906, RR-909	<p>The Applicant notes that Relevant Representations raised concerns regarding the lighting requirements during various construction activities.</p> <p>Lighting requirements are described in Chapter 6 Project Description (APP-054).</p> <p>Construction activities would normally be conducted during Monday to Friday working hours of 7am to 7pm and Saturday working hours of 7am to 1pm. As secured under Requirement 23 and Requirement 24 of the draft Development Consent Order (DCO) (APP-023). Working hours are not proposed for Sundays or Bank Holidays. Exceptions to these working hours for the works are described in section 6.9 of Chapter 6 Project Description (APP-054), these include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the Environmental Statement (ES), such as concrete pouring, dewatering, cable pulling, cable jointing and trenchless techniques; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>These construction working hours will ensure that the length of the construction period is kept to a minimum.</p> <p>Landfall lighting requirements are covered in section 6.6.2 of Chapter 6 Project Description (APP-054). It has been assumed that 24-hour lighting would be required during trenchless operations. Once onshore trenchless operations have commenced it cannot stop which means that the technique requires 24-hour working. This includes requirements for health and safety security and lighting; and construction personnel to be on site throughout this period.</p> <p>Onshore cable route lighting requirements are covered in section 6.7.3.13 of Chapter 6 Project Description (APP-054). Along the length of the onshore cable route, no 24-hour lighting is anticipated to be required except that associated with trenchless technique operations and security lighting at the Construction Consolidation Sites (CCS). Provision of manned or unmanned 24-hour security may be required within the onshore development area. Aside from the landfall there is a single potential trenchless technique crossing (of the Sandlings Special protection Area (SPA)) and if the alternative option of open-cut trenching is used this would be undertaken within the project working hours.</p> <p>Substation lighting requirements are covered in section 6.7.8.14 of Chapter 6 Project Description (APP-054). As a worst case scenario, it has been assumed that some periods of 24 hour construction will be required, for which task related flood lighting will be necessary.</p> <p>An artificial light emissions management plan is required to be included within the Code of Construction Practice (CoCP), based on the Outline CoCP (APP-578), which must be submitted to the local planning authority for approval prior to commencement of the works.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
002	Lighting during operation and maintenance	RR-023, RR-025, RR-043, RR-069, RR-070, RR-072, RR-076, RR-093, RR-094, RR-116, RR-120, RR-128, RR-129, RR-132, RR-133, RR-138, RR-148, RR-154, RR-165, RR-169, RR-171, RR-178, RR-184, RR-187, RR-195, RR-196, RR-197, RR-199, RR-202, RR-210, RR-215, RR-222, RR-231, RR-234, RR-236, RR-238, RR-241, RR-245, RR-246, RR-250, RR-253, RR-261, RR-281, RR-284, RR-305, RR-310, RR-314, RR-319, RR-320, RR-322, RR-323, RR-324, RR-327, RR-328, RR-333, RR-338, RR-338, RR-339, RR-350, RR-354, RR-361, RR-365, RR-366, RR-369, RR-370, RR-374, RR-376, RR-377, RR-378, RR-381, RR-383, RR-386, RR-388, RR-389, RR-390, RR-404, RR-416, RR-421, RR-434, RR-435, RR-436, RR-437, RR-439, RR-442, RR-443, RR-444, RR-445, RR-446, RR-447, RR-451, RR-458, RR-462, RR-473, RR-476, RR-480, RR-487, RR-494, RR-505, RR-507, RR-509, RR-527, RR-530, RR-534, RR-535, RR-536, RR-545, RR-547, RR-565, RR-566, RR-567, RR-568, RR-575, RR-589, RR-593, RR-598, RR-611, RR-612, RR-615, RR-619, RR-625, RR-626, RR-630, RR-637, RR-640, RR-649, RR-651, RR-660, RR-663, RR-667, RR-670, RR-674, RR-692, RR-693, RR-698, RR-701, RR-702, RR-713, RR-714, RR-719, RR-727, RR-728, RR-735, RR-736, RR-743, RR-748, RR-750, RR-760, RR-776, RR-790, RR-794, RR-795, RR-804, RR-816, RR-818, RR-819, RR-821, RR-823, RR-828, RR-829, RR-831, RR-834, RR-835, RR-837, RR-839, RR-842,	<p>The Applicant notes that many Relevant Representations raised concerns regarding the lighting which may be required for operation and maintenance for the Project.</p> <p>Substation lighting requirements are covered in section 6.7.8.14 of Chapter 6 Project Description (APP-054). Operational lighting requirements at the onshore substation and National Grid substation site would entail:</p> <ul style="list-style-type: none"> • Security lighting around perimeter fence of compound, to allow CCTV coverage, possibly motion sensitive; • Car park lighting – as per standard car park lighting, possibly motion sensitive; and • Repair / maintenance – task related flood lighting will be necessary. <p>No additional lighting is proposed along Grove Road or along the additional access roads within the substation location.</p> <p>An Operational Artificial Light Emissions Management Plan will be developed for the final design for the permanent infrastructure and will be submitted to the local planning authority for approval in accordance with the requirements of the draft DCO (APP-023). The plan will detail any sensitive receptors and describe the measures to minimise lighting which will be implemented, including lighting requirements, positioning and hours of operation, alongside any monitoring and reporting which might be required.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-849, RR-851, RR-852, RR-869, RR-877, RR-878, RR-888, RR-889, RR-893, RR-909	
003	Impacts of lighting on Dark Skies	RR-021, RR-042, RR-051, RR-069, RR-095, RR-098, RR-100, RR-102, RR-105, RR-138, RR-169, RR-173, RR-178, RR-193, RR-195, RR-209, RR-223, RR-224, RR-226, RR-252, RR-263, RR-281, RR-296, RR-298, RR-308, RR-325, RR-337, RR-340, RR-357, RR-358, RR-359, RR-365, RR-368, RR-389, RR-390, RR-393, RR-427, RR-436, RR-437, RR-439, RR-441, RR-445, RR-468, RR-476, RR-477, RR-487, RR-499, RR-545, RR-547, RR-571, RR-587, RR-611, RR-612, RR-633, RR-649, RR-650, RR-652, RR-653, RR-682, RR-691, RR-696, RR-706, RR-708, RR-715, RR-721, RR-786, RR-788, RR-798, RR-801, RR-802, RR-803, RR-804, RR-818, RR-819, RR-859, RR-865, RR-866, RR-874, RR-876, RR-902, RR-903, RR-904, RR-906, RR-916, RR-918	<p>The Applicant notes that Relevant Representations raised concerns regarding the impact of the Project on the dark skies associated with the Area of Outstanding Natural Beauty (AONB).</p> <p>Appendix 29.3 (APP-584) considers the potential effects from construction and operational activities on the special qualities (particularly scenic quality and tranquillity) associated with the 'big 'Suffolk skies' of the Suffolk Coast and Heaths AONB.</p> <p>During construction of the onshore cable route, short-term, temporary effects from lighting on the relative tranquillity of the area of the AONB between Thorpeness, Sizewell and Leiston will primarily be experienced. These effects would occur over several separate short 2-3 month periods of peak construction activity and not continuously throughout the construction phase. Edges of the AONB near Leiston have more urban development influences near the fringes of the AONB and are less impacted by changes resulting from the onshore cable route construction.</p> <p>During construction at landfall, the majority of the change in special qualities of the AONB will occur as a result of the trenchless technique equipment which will be in place for a maximum of 12 months. The landfall CCS areas would be removed after 24 months.</p> <p>The only operational lighting requirements are at the substation (except for occasional maintenance). The operation of the onshore substation and National Grid infrastructure will have no significant effects on the character or special qualities of the AONB. The onshore substation and National Grid infrastructure are located outside the AONB and its immediate setting, approximately 1.6km to the north of the AONB at its closest point (where the AONB covers the estuary of</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			the River Alde) and 3.7km to the west of the edge of the main 'coastal' area of the AONB (near Aldringham).
004	Impacts of lighting on animals	RR-023, RR-069, RR-093, RR-128, RR-148, RR-155, RR-184, RR-193, RR-202, RR-230, RR-252, RR-270, RR-272, RR-280, RR-284, RR-320, RR-324, RR-338, RR-339, RR-365, RR-366, RR-369, RR-370, RR-374, RR-376, RR-377, RR-397, RR-447, RR-448, RR-449, RR-480, RR-500, RR-565, RR-568, RR-611, RR-612, RR-628, RR-630, RR-649, RR-651, RR-660, RR-690, RR-695, RR-702, RR-713, RR-714, RR-736, RR-741, RR-772, RR-775, RR-786, RR-788, RR-816, RR-818, RR-819, RR-837, RR-851, RR-852, RR-873, RR-901,	<p>The Applicant notes concerns raised within Relevant Representations regarding the impact of lighting during construction and operation on animals in the local area.</p> <p>As detailed in Chapter 22 Onshore Ecology and within the Outline Landscape and Ecological Management Strategy (APP-584), there are various mitigation measures to reduce impact on animals from construction lighting as detailed below.</p> <ul style="list-style-type: none"> • For breeding birds, measures will be adopted to minimise noise, light and disturbance on identified breeding birds, such as visual screening (e.g. opaque fencing) where necessary; • For badgers, sett closure (under licence) for setts identified within onshore construction footprint, and creation of artificial setts and a protection buffer zone of 30m will be applied around all setts outside of the construction footprint (including appropriate lighting minimisation such as directional task lighting, and, where possible, working outside of the buffer zone to ensure decreased impact upon badgers). • All temporary lighting to be designed in line with the Bat Conservation Trust (BCT) Bats and Artificial Lighting in the UK guidance (2018). This to include the use of directional lighting during construction (further detailed within the Outline CoCP (APP-578). Construction phase lighting will be limited to permitted construction times in low light conditions, with lower-level security lighting at selected locations outside of these times. Dark



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>corridors during the construction phase would be provided where possible.</p> <p>These measures will be secured within an Artificial Light Emissions Management Plan which is required to be included within the CoCP, based on the Outline CoCP (APP-578), which must be submitted to the local planning authority for approval prior to commencement of the works. Section 22.6.2.2 of Chapter 22 Onshore Ecology (APP-070) discusses the disturbance to fauna (animals) from operational lighting. An Operational Artificial Light Emissions Management Plan will be developed for the final design for the permanent infrastructure, as secured under the requirements of the draft DCO (APP-023), which will include measures to minimise light spill and be designed in line with the 'Bats and Artificial Lighting in the UK' guidance.</p>



2.15 Noise and Vibration – Construction

Table 15 Applicant's Comments on Noise and Vibration - Construction

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Construction hours	RR-021, RR-023, RR-025, RR-027, RR-028, RR-042, RR-043, RR-044, RR-069, RR-070, RR-072, RR-088, RR-089, RR-093, RR-094, RR-096, RR-100, RR-102, RR-105, RR-106, RR-108, RR-109, RR-116, RR-120, RR-123, RR-129, RR-132, RR-133, RR-139, RR-140, RR-144, RR-145, RR-148, RR-154, RR-158, RR-159, RR-162, RR-165, RR-166, RR-169, RR-171, RR-173, RR-182, RR-184, RR-185, RR-186, RR-187, RR-188, RR-191, RR-192, RR-193, RR-196, RR-199, RR-200, RR-204, RR-206, RR-208, RR-215, RR-222, RR-223, RR-224, RR-227, RR-236, RR-238, RR-239, RR-244, RR-244, RR-245, RR-246, RR-248, RR-249, RR-250, RR-253, RR-254, RR-259, RR-261, RR-263, RR-268, RR-272, RR-277, RR-280, RR-283, RR-292, RR-295, RR-296, RR-299, RR-302, RR-308, RR-309, RR-310, RR-320, RR-323, RR-324, RR-326, RR-326, RR-327, RR-328, RR-329, RR-333, RR-337, RR-338, RR-339, RR-348, RR-353, RR-358, RR-361, RR-363, RR-365, RR-366, RR-368, RR-369, RR-373, RR-374, RR-377, RR-381, RR-382, RR-383, RR-386, RR-388, RR-398, RR-403, RR-404, RR-406, RR-408, RR-413, RR-416, RR-421, RR-426, RR-427, RR-428, RR-433, RR-434, RR-435, RR-436, RR-437, RR-439, RR-441, RR-442, RR-443, RR-445, RR-446, RR-447, RR-448, RR-449, RR-451, RR-453, RR-454, RR-456, RR-457, RR-458,	<p>Construction activities would normally be conducted during Monday to Friday working hours of 7am to 7pm and Saturday working hours of 7am to 1pm. Working hours are not proposed for Sundays or Bank Holidays. These working hours have been reduced on Saturdays from those originally proposed following feedback received from Section 42 consultation. Exceptions to these working hours for the works are described in section 6.9 of Chapter 6 Project Description (APP-054), for the landfall, onshore cable route and onshore substation include:</p> <ul style="list-style-type: none"> • Continuous periods of operation that are required as assessed in the Environmental Statement (ES), such as concrete pouring, dewatering, cable pulling, cable jointing and trenchless techniques; • Fitting out works associated with the onshore substation; • Delivery to the transmission work of abnormal loads that may cause congestion on the local road network; • The testing or commissioning of any electrical plant installed as part of the onshore infrastructure; and • Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>For the National Grid infrastructure, these exemptions include:</p> <ul style="list-style-type: none"> • Continuous periods of construction that are required as assessed in the ES, such as concrete pouring and the installation and



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-459, RR-460, RR-464, RR-467, RR-468, RR-472, RR-473, RR-474, RR-477, RR-480, RR-487, RR-489, RR-492, RR-493, RR-495, RR-498, RR-499, RR-500, RR-505, RR-509, RR-521, RR-526, RR-527, RR-528, RR-534, RR-535, RR-540, RR-541, RR-545, RR-546, RR-547, RR-552, RR-557, RR-558, RR-559, RR-566, RR-567, RR-568, RR-571, RR-574, RR-575, RR-576, RR-577, RR-589, RR-593, RR-596, RR-597, RR-599, RR-600, RR-605, RR-610, RR-611, RR-612, RR-617, RR-621, RR-625, RR-626, RR-630, RR-632, RR-634, RR-638, RR-640, RR-644, RR-647, RR-649, RR-653, RR-653, RR-657, RR-664, RR-665, RR-666, RR-667, RR-668, RR-674, RR-680, RR-686, RR-687, RR-690, RR-691, RR-692, RR-693, RR-695, RR-696, RR-697, RR-698, RR-699, RR-701, RR-702, RR-703, RR-704, RR-708, RR-713, RR-714, RR-715, RR-721, RR-727, RR-735, RR-736, RR-737, RR-741, RR-743, RR-746, RR-747, RR-748, RR-751, RR-754, RR-761, RR-762, RR-764, RR-765, RR-768, RR-770, RR-771, RR-772, RR-775, RR-776, RR-781, RR-782, RR-788, RR-790, RR-793, RR-794, RR-795, RR-796, RR-797, RR-798, RR-799, RR-801, RR-803, RR-805, RR-814, RR-815, RR-816, RR-818, RR-821, RR-823, RR-827, RR-828, RR-829, RR-830, RR-831, RR-833, RR-834, RR-839, RR-840, RR-842, RR-847, RR-851, RR-852, RR-859, RR-863, RR-866, RR-869, RR-873, RR-874, RR-876, RR-877, RR-878, RR-881, RR-884, RR-885, RR-887, RR-888, RR-890, RR-893, RR-899, RR-901, RR-902	<p>removal of conductors, pilot wires and associated protective netting across highways or public footpaths;</p> <ul style="list-style-type: none"> Fitting out works associated with the National Grid substation; The completion of construction activities commenced during the approved working hours which cannot safely be stopped; The testing or commissioning of any electrical plant installed as part of the National Grid infrastructure; and Activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property. <p>Working hours are secured through Requirement 23 and Requirement 24 of the draft DCO (APP-023) and will be signposted within the final Code of Construction Practice prepared post-consent to discharge Requirement 22 of the draft DCO (APP-023). The final Code of Construction Practice must accord with the Outline Code of Construction Practice submitted with the application (APP-578), which provides detail on working hours within section 3.1.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-903, RR-903 RR-904, RR-906 RR-907, RR-908 RR-909, RR-916	
002	Noise impacts arising from the installation of cables	RR-025, RR-069, RR-386, RR-388, RR-413, RR-447, RR-449, RR-632, RR-651, RR-696, RR-816, RR-851 RR-852, RR-873, RR-885, RR-887 RR-908, RR-909	<p>An assessment of construction phase noise on residential receptors along the onshore development area is presented within Section 25.6.1.1 (Impact 1) of Chapter 25 Noise and Vibration (APP-073). This assessment was undertaken in accordance with the industry accepted standard for assessing construction noise, BS5228-1:2009+A1:2014 (Code of Practice for Noise and Vibration Control on Construction and Open Sites), which defines the accepted prediction methods and source data for various construction plant and activities.</p> <p>Baseline noise monitoring was undertaken at 23 locations along the onshore cable (4 locations at the landfall site, plus 19 locations along the onshore cable route). The locations selected were agreed with the local planning authority via the Noise and Vibration ETG and represent the nearest noise sensitive receptors (for example, residential properties). Details of these 23 locations are set out within Table 25.3.1 and Table 25.3.4 of Appendix 25.4 Construction Phase Assessment (APP-525). Daytime and night time baseline noise data for the landfall is presented within section 25.3.3 and for the onshore cable route is presented in section 25.3.4.</p> <p>The results presented in Table 25.27 of Chapter 25 Noise and Vibration (APP-073) show that predicted daytime noise levels received at the receptors do not exceed the noise level thresholds where an impact occurs, as defined by the British Standard (BS5228-1:2009+A1:2014), where the embedded mitigation in Table 25.3 is implemented (as outlined below). As such, the assessment concludes there will be no impact on receptors from daytime construction noise along the onshore cable route.</p>



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



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> Regular communication with site neighbours to inform them of the construction schedule, and when noisy activities are likely to occur. <p>In addition, jointing bays will not be constructed within 55m of a building used as a dwelling-house in accordance with Requirement 12(15) of the draft DCO (APP-023).</p>
003	Noise impacts from increased traffic during construction	RR-043, RR-088, RR-130, RR-131, RR-140, RR-145, RR-155, RR-185, RR-186, RR-206, RR-227, RR-236, RR-251, RR-259, RR-280, RR-283, RR-292, RR-293, RR-302, RR-322, RR-327, RR-386, RR-397, RR-405, RR-406, RR-421, RR-445, RR-456, RR-464, RR-471, RR-487, RR-527, RR-537, RR-542, RR-552, RR-557, RR-566, RR-567, RR-568, RR-589, RR-604, RR-607, RR-617, RR-632, RR-640, RR-647, RR-665, RR-669, RR-670, RR-693, RR-695, RR-696, RR-744, RR-746, RR-754, RR-756, RR-770, RR-803, RR-805, RR-814, RR-815, RR-816, RR-821, RR-828, RR-830, RR-831, RR-851, RR-852, RR-859, RR-870, RR-873, RR-878, RR-881, RR-885, RR-887, RR-890, RR-892, RR-893, RR-895, RR-899, RR-901, RR-911, RR-912, RR-917, RR-918.	<p>An assessment of construction phase noise on residential receptors arising from construction traffic is presented within section 25.6.1.2 (Impact 2) of Chapter 25 Noise and Vibration (APP-073). This comprised an exercise to assess whether any significant changes in traffic volume are anticipated and whether any associated change in noise level would arise, which was assessed following the methodology set out in the Design Manual for Roads and Bridges (Volume 11, Section 3, Chapter 7) (as per section 25.4.3.2.1 of Chapter 25 Noise and Vibration (APP-073). The assessment concluded that construction phase traffic noise impacts would be no greater than minor magnitude, and of a minor adverse significance. For example, the greatest change in noise levels when compared with the 2023 background noise levels would be +1.6dBA along the B1069 from the A1094 to Coldfair Green, when a 3dBA change in environmental noise level is accepted to be the lowest perceptible level.</p> <p>Given the level of impact assessed no additional mitigation measures are required beyond the embedded mitigation set out within Table 25.3 of Chapter 25 Noise and Vibration (APP-073). Embedded mitigation measures include the implementation of traffic management measures and the preparation of a Construction Traffic Management Plan to be</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>approved by the relevant local planning authority prior to commencement, as secured by Requirement 28 of the draft DCO (APP-023).</p> <p>Construction phase noise will also be controlled through the production of a Construction Phase Noise and Vibration Management Plan post-consent, which is to be submitted to and approved by the local planning authority in advance of construction works commencing, as part of the Code of Construction Practice secured under Requirement 22 of the draft DCO (APP-023). The specific control measures set out within the Construction Phase Noise and Vibration Management Plan will be complied with during the construction phase. Best practice noise mitigation measures, to be implemented and controlled through the Construction Phase Noise and Vibration Management Plan (in relation to traffic and transport), will typically include:</p> <ul style="list-style-type: none"> • Management of construction operating hours; • Implementation of traffic management measures such as agreed routes for construction traffic. • Use of pre-construction survey to identify road surface irregularities which require remediation in order to mitigate vibration impacts.
004	No protection (mitigation) against construction phase noise impacts	RR-302, RR-310, RR-323, RR-328, RR-373, RR-374 , RR-376, RR-377, RR-382, RR-388, RR-408, RR-416, RR-435, RR-494, RR-526, RR-535, RR-649, RR-651, RR-674, RR-693, RR-698, RR-702, RR-713, RR-714, RR-748, RR-750, RR-764, RR-816, RR-823, RR-839,	<p>An assessment of construction phase noise on residential receptors along the onshore development area is presented within section 25.6.1.1 (Impact 1) of Chapter 25 Noise and Vibration (APP-073). The results presented in Table 25.27 of Chapter 25 Noise and Vibration (APP-073) show that predicted noise levels at the onshore cable route noise sensitive receptor locations arising from construction works would be of no magnitude and therefore negligible significance. Similarly, the results</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-851, RR-852, RR-873, RR-885, RR-887, RR-888, RR-906, RR-908, RR-909.	<p>presented in Table 25.28 show that predicted noise levels at the onshore substation and National Grid infrastructure noise sensitive receptor locations arising from construction works would be of no magnitude and therefore negligible significance.</p> <p>As per Table 25.3 of Chapter 25 Noise and Vibration (APP-073), a Construction Phase Noise and Vibration Management Plan will be produced post-consent as part of the Code of Construction Practice, prior to the commencement of construction, to manage construction phase noise. This will set out measures, including construction operating hours and acoustic mitigation methods, to be implemented during construction to mitigate impacts in relation to noise arising from construction activities.</p> <p>The approach to monitoring noise during the construction phase will be secured through the Code of Construction Practice, of which an outline version has been submitted as part of the application for the Project (APP-578).</p>
005	Impact on peace and tranquillity during the construction phase	RR-021, RR-025, RR-028, RR-042, RR-096, RR-098, RR-100, RR-102, RR-105, RR-109, RR-125, RR-126, RR-128, RR-129, RR-130, RR-151, RR-162, RR-163, RR-166, RR-173, RR-174, RR-188, RR-194, RR-195, RR-196, RR-199, RR-200, RR-202, RR-213, RR-214, RR-221, RR-223, RR-226, RR-227, RR-231, RR-236, RR-239, RR-241, RR-242, RR-243, RR-248, RR-252, RR-253, RR-253, RR-257, RR-258, RR-263, RR-267, RR-270, RR-272, RR-277, RR-281, RR-295, RR-298, RR-305, RR-308, RR-309, RR-310, RR-315, RR-317, RR-319, RR-321, RR-322, RR-323, RR-326, RR-328, RR-341, RR-350, RR-353, RR-354, RR-357, RR-358,	<p>The Applicant notes the concerns raised in Relevant Representations regarding construction phase noise impacts upon the tranquillity of the rural environs.</p> <p>A construction phase noise and vibration assessment has been undertaken and is presented within Chapter 25 Noise and Vibration (APP-073), which assesses a realistic worst case scenario. The worst case scenario is defined in terms of the construction footprint and activities in accordance with the construction programme as well as the highest sensitivity receptors (i.e. a building used as a dwelling-house) at the nearest locations to the onshore development area.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-368, RR-373, RR-374, RR-378, RR-380, RR-382, RR-397, RR-400, RR-403, RR-420, RR-427, RR-429, RR-430, RR-433, RR-435, RR-436, RR-437, RR-439, RR-440, RR-441, RR-451, RR-453, RR-454, RR-459, RR-460, RR-462, RR-465, RR-467, RR-468, RR-471, RR-477, RR-489, RR-492, RR-494, RR-504, RR-505, RR-507, RR-521, RR-527, RR-528, RR-530, RR-531, RR-532, RR-535, RR-542, RR-552, RR-554, RR-559, RR-567, RR-577, RR-581, RR-587, RR-592, RR-599, RR-604, RR-619, RR-625, RR-628, RR-630, RR-633, RR-652, RR-653, RR-668, RR-674, RR-682, RR-690, RR-691, RR-693, RR-696, RR-697, RR-698, RR-699, RR-706, RR-708, RR-709, RR-711, RR-715, RR-716, RR-721, RR-738, RR-739, RR-747, RR-748, RR-778, RR-786, RR-790, RR-798, RR-800, RR-801, RR-802, RR-803, RR-811, RR-816, RR-823, RR-827, RR-831, RR-839, RR-848, RR-849, RR-851, RR-852, RR-864, RR-865, RR-866, RR-870, RR-874, RR-876, RR-885, RR-887, RR-888, RR-899, RR-902, RR-916.	<p>Noise related impacts associated with the construction phase are temporary in nature and correspond to the construction programme, of which an indicative illustration is presented within Plate 6.32 of Chapter 6 Project Description (APP-054). The assessment presented within Chapter 25 Noise and Vibration (APP-073) concludes that all construction phase noise represents no greater than a minor adverse impact to the most sensitive receptors (residential properties). The landscape at the substation site is not designated for any special qualities of peace or tranquillity; and consequently there is no assessment of these experiential special qualities within Chapter 25 Noise and Vibration (APP-073).</p> <p>To avoid unnecessarily extended durations of construction phase noise impacts, the onshore cable route has been divided into four sections (separated by Construction Consolidation Sites (CCSs)) for either concurrent or sequential working. Within each of the sections, work would be undertaken in a practical, logical and sequential manner. Wherever practical, the works would commence from one CCS and terminate at the next.</p> <p>It is considered that (based on the assessment in Chapter 25 Noise and Vibration (APP-073)) the Project has avoided significant impacts for noise and vibration. Construction phase noise will be controlled through the production of a Construction Phase Noise and Vibration Management Plan post-consent, which is to be submitted to and approved by the local planning authority in advance of construction works commencing, as part of the Code of Construction Practice secured under Requirement 22 of the draft DCO (APP-023). The specific control measures set out within the Construction Phase Noise and Vibration Management Plan will be complied with during the construction phase. Best practice noise</p>



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



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none">• Use of pre-construction survey to identify road surface irregularities which require remediation in order to mitigate vibration impacts.



2.16 Noise and Vibration – Operation

Table 16 Applicant's Comments on Noise and Vibration - Operation

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Operational noise limit at specific receptors (and not all residential receptors)	RR-025, RR-071, RR-106, RR-149, RR-183, RR-242, RR-283, RR-330, RR-331, RR-338, RR-339, RR-366, RR-388, RR-426, RR-447, RR-448, RR-448, RR-449, RR-596, RR-649, RR-664, RR-690, RR-738, RR-739, RR-743, RR-748, RR-760, RR-816, RR-851, RR-852, RR-885, RR-887, RR-906, RR-908, RR-909	<p>Requirement 26 and Requirement 27 of the draft DCO (APP-023) govern the Applicant to control operational noise levels of the Project(s) substation(s) to 34dBA LAeq (5 min) at the nearest residential properties to the onshore substation:</p> <ul style="list-style-type: none"> 1 Woodside Cottages, Grove Road (641837, 261172) (noise sensitive receptor SSR2); and Woodside Barn Cottages, Church Road (641237, 260645) (noise sensitive receptor SSR5 NEW). <p>The Applicant notes a discrepancy in the address of SSR2 presented within the Development Consent Order (DCO) Requirement wording and Appendix 25.5 (APP-526). For clarity, these represent the same property and the DCO Requirement wording identifies the correct address.</p> <p>As detailed within section 25.6.2.1 (Impact 1) of Chapter 25 Noise and Vibration (APP-073), following the implementation of mitigation and compliance with the operational noise limit stipulated in the draft DCO (APP-023) (34dBA LAeq (5 min)), the assessment concludes a negligible impact at SSR2. A minor adverse operational night time noise impact upon the noise sensitive receptor SSR5 NEW is only realised in cumulation with East Anglia ONE North, as identified in section 25.2.4.1 of Appendix 25.2 of the ES (APP-523). When mitigated to comply with the operational noise limit stipulated in the draft DCO (APP-023) (34dBA LAeq (5 min)), the residual impact is assessed to be negligible.</p> <p>The limiting of operational noise received at SSR2 and SSR5 NEW emanating from the Project substation equal to or no greater than 34dBA LAeq (5 min),</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			represents a +5dB increase on measured background noise levels, as per the accepted guidance within Section 11 of BS4142:2014+A1:2019. Operational noise levels at receptors further away from the onshore substation will be lower than those received at SSR2 and SSR5 NEW. Therefore, by limiting noise levels received at the closest noise sensitive receptors to the Project substation (SSR2 and SSR5 NEW), this will have the effect of limiting noise levels at receptors further afield. As an example of how noise levels reduce with distance, the predicted night time noise level at SSR6 (3 Church Road, Friston, IP17 1PX) received from the operation of the Project substation is calculated to be 21.4dBA (Table 25.33 of Chapter 25 Noise and Vibration (APP-073)), compared with 33dBA received at SSR2 (1 Woodside Cottages, Grove Road, Friston, IP17 1TL). Plate A25.5.2 within the Project operational noise assessment (Appendix 25.5 (APP- 526)) presents the operational noise contour bands, which illustrates the reduction in predicted noise levels over distance from source at the onshore substation.
002	Underestimation of noise within assessment (no corrections for tonality applied)	RR-025, RR-043, RR-069, RR-148, RR-169, RR-193, RR-195, RR-232, RR-338, RR-339, RR-366, RR-421, RR-494, RR-664, RR-702, RR-743, RR-795, RR-816, RR-851, RR-852, RR-885, RR-887, RR-908, RR-909	The Applicant is currently in discussions with East Suffolk Council and Suffolk County Council on their assessment of and position on tonality. Further clarification will be provided by way of a clarification note during Examination.
003	Cumulative operation phase noise impacts inadequately assessed (without consideration of National Grid infrastructure)	RR-198, RR-893, RR-917	As per Table 25.2 of Chapter 25 Noise and Vibration (APP-073): <i>The equipment required at the National Grid substation for operation does not include components which would contribute any significant noise contributions in the area. Normal operational noise levels are expected to be minimal as there are no transformers on the site. Diesel generators and</i>



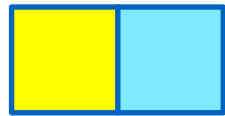
No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p><i>circuit breakers would be active only during maintenance or during a system fault.</i></p> <p>This information was received from National Grid during the pre-application stage and used to inform the assessments. This confirms that the National Grid infrastructure will not affect the noise levels received at receptors.</p> <p>The Applicant notes that some Relevant Representations draw comparisons between the proposed onshore substation and National Grid infrastructure for the Project and the operational East Anglia ONE onshore substation and National Grid substation at Bramford. The Applicant wishes to clarify that the National Grid substation equipment proposed for the Project is different to that used for the East Anglia ONE National Grid substation, and caution should be exercised when drawing such comparisons given the differences in equipment and physical factors such as distance to receptors, topography and land use.</p>
004	Unacceptable operation noise limits	RR-025, RR-043, RR-069, RR-106, RR-127, RR-128, RR-131, RR-139, RR-148, RR-149, RR-169, RR-184, RR-195, RR-207, RR-208, RR-233, RR-238, RR-241, RR-243, RR-320, RR-338, RR-339, RR-350, RR-365, RR-369, RR-373, RR-374, RR-383, RR-386, RR-388, RR-445, RR-447, RR-449, RR-463, RR-473, RR-526, RR-527, RR-568, RR-588, RR-589, RR-592, RR-598, RR-640, RR-649, RR-664, RR-664, RR-679, RR-690, RR-696, RR-713, RR-714, RR-760, RR-764, RR-771, RR-772, RR-775,	<p>An operational noise limit of background +5dBA on noise sensitive receptors has been applied to the operational noise emissions emanating from the onshore substation. This is in accordance with BS4142:2014+A1:2019 and secured through the draft Development Consent Order. An assessment of existing noise levels is presented within Appendix 25.3 (APP-524) and summarised in section 25.5 of Chapter 25 Noise and Vibration (APP-073). A baseline noise of 29dB was recorded during baseline monitoring, meaning an operational noise limit of 34dB LAeq (5 minutes) has been adopted.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-776, RR-794, RR-816, RR-818, RR-819, RR-821, RR-835, RR-851, RR-852, RR-873, RR-885, RR-887, RR-893	
005	Impact on peace, tranquillity and rural noise environment	RR-021, RR-025, RR-095, RR-098, RR-125, RR-151, RR-163, RR-166, RR-174, RR-194, RR-195, RR-196, RR-197, RR-202, RR-213, RR-214, RR-221, RR-223, RR-226, RR-227, RR-231, RR-236, RR-243, RR-252, RR-253, RR-257, RR-258, RR-259, RR-267, RR-270, RR-281, RR-298, RR-305, RR-309, RR-315, RR-317, RR-319, RR-321, RR-322, RR-323, RR-327, RR-354, RR-357, RR-368, RR-374, RR-376, RR-377, RR-378, RR-380, RR-397, RR-400, RR-420, RR-429, RR-430, RR-435, RR-440, RR-453, RR-454, RR-459, RR-460, RR-462, RR-465, RR-489, RR-492, RR-494, RR-504, RR-507, RR-521, RR-528, RR-530, RR-531, RR-532, RR-542, RR-552, RR-577, RR-581, RR-587, RR-599, RR-604, RR-619, RR-628, RR-633, RR-652, RR-669, RR-670, RR-682, RR-690, RR-693, RR-696, RR-699, RR-706, RR-709, RR-716, RR-747, RR-754, RR-756,	<p>The landscape at the substation site is not designated for any special qualities of peace or tranquillity; and consequently there is no assessment of these experiential special qualities within Chapter 25 Noise and Vibration (APP-073). The assessment has considered the most sensitive noise receptors (residential dwellings) and concluded that with appropriate mitigation there are minor adverse impacts. Specific mitigation includes compliance with the operational noise limit of 34dBA at receptors SSR2 and SSR5 NEW, as stipulated in Requirement 26 and Requirement 27 of the draft DCO (APP-023).</p> <p>With respect to tranquillity, an assessment methodology (considering operational noise impacts to local Public Rights of Way (PRoW)) is being prepared and informed through discussions with East Suffolk Council and Suffolk County Council.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-778, RR-786, RR-790, RR-800, RR-802, RR-811, RR-831, RR-848, RR-849, RR-864, RR-865, RR-892, RR-895, RR-899, RR-901, RR-911, RR-912, RR-918.	
006	Inappropriate height and positioning of harmonic filters	RR-042, RR-043, RR-155, RR-231, RR-322, RR-598	The proposed height of the harmonic filters within the assessment represents a worst case scenario. Post-consent, during the detailed design phase, the precise siting and design (including the height of the structures) is subject to change, albeit the noise limit within the DCO must be achieved with the final design.
007	Atmospheric effects on noise	RR-043, RR-069, RR-096, RR-102, RR-105, RR-109, RR-148, RR-308	An assessment of atmospheric effects on noise is not included within the noise assessments presented given this is not a requirement of, or consistent with, the guidance that informed the noise assessment methodology (BS4142:2014+A1:2019). The guidance states specifically to avoid undertaking measurements during periods of temperature inversions, so the modelling undertaken is considered to be a worst case scenario. The baseline noise monitoring data collected was therefore compared with weather data. Where weather was identified to have influenced baseline noise measurements, these data were omitted from the dataset and not used within the model. As such, the operational noise model presented within the assessment is based upon background noise levels unaffected by weather, which corresponds with the assessment methodology in BS4142:2014+A1:2019.
008	Increase in noise from relocating overhead lines	RR-069, RR-116, RR-128, RR-143, RR-148, RR-049, RR-199, RR-238, RR-243, RR-338, RR-339, RR-340, RR-350, RR-365, RR-366, RR-373, RR-376, RR-377, RR-383, RR-458,	Section 25.3.2.1 of Chapter 25 Noise and Vibration (APP-073) states that: <i>The design of the overhead line (L6 quad Zebra line) is one of the quietest designs available on the 400 kV transmissions system. The permanent overhead line realignment would comply with all relevant National Grid</i>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-589, RR-595, RR-611, RR-612, RR-649, RR-664, RR-702, RR-713, RR-714, RR-743, RR-775, RR-795, RR-803, RR-804, RR-816, RR-818, RR-819, RR-837, RR-851, RR-852, RR-897, RR-149, RR-202, RR-665,	<p><i>specification standards and is considered to be consistent with the existing overhead line design in vicinity of the onshore development area.</i></p> <p>Despite a decrease in separation distance between source and receptors (primarily SSR3 and SSR9), the assessment finds the resultant change in noise upon residential receptors to be imperceptible, as per section 25.3.2.1 of Chapter 25 Noise and Vibration (APP-073). As per section 25.3.2.1, the increase in noise at SSR3 and SSR9 is assessed as 1.3dBA and 1.1dBA respectively, when a 3dBA change in environmental noise level is accepted to be the lowest perceptible level.</p>



2.17 Offshore Ring Main

Table 17 Applicant's Comments on Offshore Ring Main

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Option for an Offshore Ring Main	RR-020, RR-049, RR-068, RR-070, RR-071, RR-080, RR-104, RR-118, RR-121, RR-122, RR-125, RR-132, RR-133, RR-141, RR-150, RR-151, RR-168, RR-170, RR-175, RR-176, RR-192, RR-204, RR-216, RR-230, RR-266, RR-281, RR-288, RR-297, RR-301, RR-312, RR-317, RR-324, RR-346, RR-355, RR-356, RR-371, RR-387, RR-409, RR-411, RR-452, RR-457, RR-463, RR-464, RR-466, RR-499, RR-500, RR-502, RR-511, RR-513, RR-523, RR-547, RR-557, RR-609, RR-616, RR-625, RR-627, RR-631, RR-635, RR-640, RR-649, RR-656, RR-657, RR-659, RR-661, RR-671, RR-675, RR-681, RR-688, RR-715, RR-721, RR-723, RR-724, RR-750, RR-752, RR-754, RR-778, RR-789, RR-790, RR-797, RR-803, RR-807, RR-825, RR-827, RR-853, RR-854, RR-855, RR-860, RR-862, RR-896, RR-900, RR-915, RR-917, RR-919.	<p>The Applicant notes queries raised within Relevant Representations regarding the option of an offshore ring main.</p> <p>The requirement to consider alternatives as part of the Environmental Impact Assessment (EIA) process is contained within the EIA Directive, transposed into UK law by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations") in the context of an application for a Development Consent Order (DCO) for a Nationally Significant Infrastructure Project (NSIP).</p> <p>Regulation 14 of the EIA Regulations states that an application for a DCO for EIA development must be accompanied by an ES which must include, among other things, a description of the <u>reasonable</u> alternatives studied by the Applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.</p> <p>In 2017, the European Commission (EC) published Guidance on the preparation of an Environmental Impact Assessment Report (or ES) which provides at Section 1.5.1 that:</p> <p><i>"Reasonable Alternatives' must be relevant to the proposed Project and its specific characteristics, and resources should only be spent assessing these Alternatives. In addition, the selection of Alternatives is limited in terms of feasibility. On the one hand, an Alternative should not be ruled out simply because it would cause inconvenience or cost to the Developer. At the same time, if an Alternative is very expensive or technically or legally difficult, it would be unreasonable to consider it to be a feasible Alternative."</i></p>



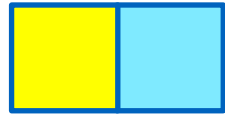
No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p><i>The EC Guidance goes on to say that “ultimately, Alternatives have to be able to accomplish the objectives of the Project in a satisfactory manner, and should also be feasible in terms of technical, economic, political and other relevant criteria.”</i></p> <p>Box 29 of the EC Guidance provides a list of key reasons why an alternative may be considered unreasonable or unfeasible and this includes the following:</p> <ul style="list-style-type: none"> • “There are technological obstacles: high costs of a required technology may prevent it from being considered to be a viable option, or the lack of technological development may preclude certain options from consideration; • There are budget obstacles: adequate resources are required to implement Project Alternatives; • There are stakeholder obstacles: stakeholders opposed to a Project Alternative may make a particular option unattractive; • There are legal or regulatory obstacles: regulatory instruments may be in place that limit/prohibit the development of a specific Alternative.” <p>National Grid, in conjunction with offshore developers including ScottishPower Renewables, coordinated a study to look at an offshore ring main, and in 2015 it published its report ‘Integrated Offshore Transmission Project (East) Final Report: Conclusions and Recommendations, August 2015’. It examined, in the context of the East Anglia, Hornsea and Dogger Bank Round 3 Zones, the potential for offsetting the need for new onshore infrastructure by establishing an integrated design approach to the connection of these generation zones. This approach would include the use of inter-connection between offshore zones (via offshore transmission assets) and optimising connections to the onshore transmission system. The findings outlined a number of issues associated with a potential offshore ring main and concluded that in relation to an offshore ring main, “... <i>the project team does not</i></p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p><i>believe it would be economic and efficient to progress with the development of an integrated design philosophy or delivery of anticipatory assets at this time”.</i></p> <p>In summary, some of the issues that systemic solution(s) (including an offshore ring main) would need to consider include:</p> <ul style="list-style-type: none"> • The regulatory framework – there is currently no regulatory framework in place which would support an offshore ring main and as far as the Applicant is aware, neither the Government nor Ofgem has published any form of detailed proposals in this regard. Any such review would require to address a wide range of regulatory, cost and budget obstacles. • Technical and deliverability (financial) considerations – so far as the Applicant is aware, there is no fully worked up design of an offshore ring main and it could take a number of years to develop and consent the infrastructure. Further, the funding of onshore and offshore electricity transmission is subject to a regulatory regime overseen by Ofgem. So far as onshore transmission is concerned the relevant transmission licensees, National Grid Electricity Transmission (the owner of the transmission assets in East Anglia), and National Grid Electricity System Operator (the system operator) are both subject to a duty under section 9(2)(a) of the Electricity Act 1989 “<i>to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.</i>” The National Grid Report also addressed the efficiency of more integrated offshore solutions and concluded: “<i>market indicators show that development of offshore wind generation in the zones considered will not reach the required levels of capacity in near term timescales that would be required to make the implementation of an integrated design economic and efficient.</i>” • Consenting – the National Grid Report notes that the offshore network would require to be consented. The timescales involved will vary depending on the extent to which the technical solutions still require to be developed, the proposed consenting strategy to be taken forward and the extent of



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>environmental information required. There will also be the question of who develops and consents the ring main and covers the cost of such work.</p> <p>The timetable for the significant reform required to establish a regulatory and technical framework for an offshore ring main is likely to take a number of years. The Applicant is currently in the consenting process for the Project and must work within the constraints of the current regulatory framework in order to deliver the project. The National Policy Statement (EN-3) for Renewable Energy Infrastructure states at paragraph 2.6.34 that: <i>"Applicants for consent for offshore wind farms will have to work within the regulatory regime for offshore transmission networks established by Ofgem. Under the regime offshore transmission will be a licensed activity regulated by Ofgem."</i></p> <p>At present there is no appointed coordinator for offshore wind grid development nor any reference to coordinated offshore development in the National Policy Statement (NPS) (EN-5) for Electricity Networks. An offshore ring main is therefore not a reasonable alternative that could have been considered as an alternative to the transmission infrastructure proposed within the Application.</p> <p>Ofgem's Decarbonisation Action Plan, 3rd February 2020, confirms that they are tasked with looking at an options assessment for offshore transmission and further work will need to be undertaken after that. Changes to a coordinated approach on offshore transmission would require regulatory change to deliver it and it is likely to be subject to public procurement. Given the considerable time periods that would be involved in developing this, the Applicant has a legitimate expectation that the Applications will be considered within the current regulatory framework in light of paragraph 2.6.34 of NPS EN-3.</p> <p>The EC Guidance states that alternatives should be able to accomplish the objectives of the project in a satisfactory manner, and should also be feasible in terms of</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>technical, economic, political and other relevant criteria. In the case of the Project, the key objective is the delivery of much needed renewable energy, policy support for which is made out in the Overarching NPS for Energy (NPS EN-1). In the context of alternatives, NPS EN-1 states at paragraph 4.4.3 that the Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale as the proposed development.</p> <p>It is clear that there are a number of barriers in place to an offshore ring main solution, including technological, economic, legal and regulatory barriers. The fact that there is currently no regulatory framework in place which would support an offshore ring main would not only constitute a regulatory barrier to the offshore ring main being a reasonable alternative, but it would also result in unacceptable delays to the Project which would prevent it from achieving its objective of delivering renewable energy within the current proposed timescales.</p> <p>The ES considers alternatives in Chapter 4 Site Selection and Assessment of Alternatives (APP-052), however the offshore ring main was not considered as an alternative within the chapter as it was not a reasonable alternative.</p>



2.18 Onshore Ecology

Table 18 Applicant's Comments on Onshore Ecology

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Impact on designated sites, habitats and species and the mitigation measures to be applied	RR-025, RR-027, RR-068, RR-071, RR-044, RR-089, RR-095, RR-099, RR-101, RR-103, RR-110, RR-112, RR-116, RR-119, RR-126, RR-130, RR-131, RR-153, RR-155, RR-156, RR-168, RR-170, RR-171, RR-175, RR-177, RR-180, RR-182, RR-184, RR-195, RR-198, RR-201, RR-212, RR-213, RR-214, RR-226, RR-228, RR-239, RR-247, RR-252, RR-257, RR-258, RR-267, RR-272, RR-277, RR-299, RR-350, RR-383, RR-480, RR-505, RR-540, RR-541, RR-611, RR-612, RR-630, RR-649, RR-684, RR-690, RR-736, RR-772, RR-775, RR-816, RR-818, RR-819, RR-821, RR-851, RR-027, RR-039, RR-044, RR-067, RR-068, RR-072, RR-086, RR-088, RR-089, RR-091, RR-094, RR-100, RR-104, RR-120, RR-121, RR-122, RR-143, RR-148, RR-153, RR-154, RR-165, RR-178, RR-181, RR-182, RR-184, RR-192, RR-193, RR-195, RR-203, RR-208, RR-210, RR-225, RR-227, RR-232, RR-236,	<p>The Applicant notes queries raised in Relevant Representations regarding potential impacts on designated sites, habitats, species and mitigation measures to be applied. The Applicant has engaged with a wide range of statutory and non-statutory consultees as described in Appendix 22.1 of Chapter 22 Onshore Ecology (APP-501), through the Evidence Plan Process (EPP) and creation of Expert Topic Groups (ETGs) in which due consideration has been given to onshore ecology.</p> <p>A number of surveys as described below have been undertaken to inform the baseline environment which has ensured a robust assessment of potential impacts on designated sites, habitats and species that were agreed with the LPA and Natural England to be scoped into the Project assessment. More detail on the assessment and the surveys undertaken to inform it can be found in the following documents:</p> <ul style="list-style-type: none"> • ES Chapter 22 Onshore Ecology (APP-070) • Appendix 22.4 - eDNA Survey Report (APP-505), Figure 22.10a-f - eDNA Survey Results (APP-283). • Appendix 22.3 - Extended Phase 1 Habitat Survey (Part 1 of 2) (APP-503), Appendix 22.3 - Extended Phase 1 Habitat Survey (Part 2 of 2) (APP-504), Figure 22.4a-f - Extended Phase 1 Habitat Survey Results (APP-277) • Appendix 22.5 - Water Vole and Otter Presence or Absence Survey Report (APP-506), Figure 22.9a-f - Water Vole and Otter Habitat Survey Results (APP-282) • Figure 22.6a-f - Badger Survey Results (APP-279)



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-242, RR-246, RR-248, RR-249, RR-250, RR-254, RR-261, RR-266, RR-268, RR-673, RR-270, RR-275, RR-276, RR-280, RR-284, RR-299, RR-302, RR-313, RR-319, RR-324, RR-325, RR-338, RR-339, RR-356, RR-366, RR-371, RR-381, RR-393, RR-408, RR-418, RR-419, RR-421, RR-423, RR-428, RR-431, RR-432, RR-434, RR-442, RR-446, RR-447, RR-448, RR-449, RR-453, RR-456, RR-457, RR-474, RR-481, RR-498, RR-499, RR-500, RR-506, RR-507, RR-511, RR-513, RR-540, RR-541, RR-554, RR-547, RR-565, RR-564, RR-569, RR-593, RR-595, RR-596, RR-597, RR-598, RR-600, RR-602, RR-603, RR-604, RR-605, RR-616, RR-617, RR-621, RR-625, RR-626, RR-631, RR-639, RR-640, RR-641, RR-649, RR-650, RR-651, RR-655, RR-662, RR-664, RR-666, RR-669, RR-677, RR-684, RR-685, RR-692, RR-702, RR-707, RR-711, RR-716, RR-720, RR-727, RR-743, RR-745, RR-778, RR-793, RR-794, RR-807, RR-813, RR-816, RR-820, RR-822, RR-842, RR-850, RR-851, RR-852, RR-868, RR-869, RR-873, RR-882,	<ul style="list-style-type: none"> • Appendix 22.6 - Bat Survey Report (APP-507), Figure 22.7a-g - Bat Roost and Commuting Foraging Habitat Results (APP-280), Figure 22.8a-f - Bat Survey Results (APP-281) <p>As stated in Chapter 22 Onshore Ecology (APP-070), sections 22.6 and 22.10, the potential impacts to habitats and species have been assessed by way of desk-based assessments and field surveys.</p> <p>The following species and species' groups are assessed:</p> <ul style="list-style-type: none"> • Badger • Bats • Water vole and otter • Great crested newt • Reptiles • Dormice • Invertebrates <p>The habitat types assessed are:</p> <ul style="list-style-type: none"> • Arable habitats • Grassland habitats • Woodland and trees • Coastal habitats • Watercourses and ponds <p>The Applicant has committed to a number of measures that will mitigate impacts on onshore ecology receptors. These are described in Table 22.4 of Chapter 22 Onshore Ecology (APP-070) and outlined in the following.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-885, RR-887, RR-893, RR-907, RR-913, RR-281, RR-286, RR-289, RR-293, RR-306, RR-314, RR-320, RR-329, RR-330, RR-331, RR-335, RR-343, RR-346, RR-357, RR-380, RR-387, RR-396, RR-405, RR-414, RR-422, RR-429, RR-433, RR-440, RR-443, RR-452, RR-458, RR-460, RR-463, RR-465, RR-478, RR-492, RR-494, RR-504, RR-508, RR-520, RR-526, RR-530, RR-532, RR-536, RR-556, RR-558, RR-563, RR-572, RR-573, RR-576, RR-578, RR-585, RR-589, RR-607, RR-614, RR-618, RR-622, RR-628, RR-629, RR-637, RR-642, RR-645, RR-661, RR-667, RR-675, RR-678, RR-681, RR-709, RR-725, RR-732, RR-733, RR-738, RR-750, RR-758, RR-761, RR-672, RR-766, RR-770, RR-784, RR-791, RR-830, RR-890	<p><u>Plans and Documents</u></p> <p>An Outline Landscape and Ecological Management Strategy (OLEMS) (APP-584) has been submitted with the application. The OLEMS (APP-584) outlines the requirement for landscape and ecological mitigation measures that are reflective of the surveys and impact assessment carried out for the onshore infrastructure of the Project.</p> <p>The Applicant has undertaken preliminary micro-siting of the onshore infrastructure in order to avoid known badger setts and will undertake pre-construction surveys and ensure final design of the works avoid and mitigate disturbance to badger setts accordingly. There are areas within the Order Limits which can provide mitigation for badgers if required.</p> <p>Requirement 14 of the draft DCO (APP-023), states that a Landscape Management Plan (LMP) and associated work programme must be submitted to and approved by the planning authority before any onshore works can commence. Requirement 15 of the draft DCO then states that all landscaping works must be carried out in accordance with the approved LMP.</p> <p>Requirement 21 of the draft DCO (APP-023), states that an Ecological Management Plan (EMP) (which will include an SPA Crossing Method Statement and Breeding Bird Protection Plan) must be submitted to and approved by the planning authority in consultation with the relevant statutory nature conservation body (SNCB), before any onshore works can commence. Both the LMP and the EMP must accord with the OLEMS.</p> <p>The SPA Crossing Method Statement will include mitigation measures specifically relating to the SPA crossing, including habitat restoration.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p><u>Designated Sites</u></p> <p>The route of the onshore cable corridor was influenced from the onset of the Project design process by the location of designated sites, specifically The Sandlings SPA and component Leiston-Aldeburgh SSSI. The Project design minimises the overlap of the onshore cable corridor with these designated sites, choosing a crossing at the narrowest point, within habitat where no records of ornithological target species were found.</p> <p>The Applicant's preference is for an open-cut trenching technique to cross the Sandlings SPA. As noted in section 22.6.1.1.2 of Chapter 22 Onshore Ecology (APP-070), the onshore cable route will cross the Sandlings SPA at its narrowest point, towards the north of the SPA and the Applicant has committed to a reduced onshore cable route working width of 16.1m (reduced from 32m) within the SPA to minimise habitat loss.</p> <p>The Applicant will submit an EMP for approval by the Local Planning Authority in consultation with the relevant SNCB. In accordance with Requirement 21 of the draft DCO this will include a SPA crossing method statement. The Applicant will produce an outline SPA Crossing Method Statement that will provide further details on the methodology to be adopted for an open trench crossing, and for a trenchless technique (such as HDD).</p> <p>Additionally, the Applicant will not undertake onshore cable route construction works to cross the Sandlings SPA / Leiston – Aldeburgh Site of Special Scientific Interest (SSSI) within the SPA/SSSI boundary or within 200m of the SPA/SSSI boundary during the breeding bird season unless otherwise agreed with Natural England that bird breeding activities within 200m of the SPA/SSSI crossing works area have ceased. See Chapter 23 Onshore Ornithology (APP-071) for more detail.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>Landscaping works such as hedgerow replanting may be undertaken outside these periods to ensure optimal planting conditions are achieved.</p> <p><u>Trenchless Technique at Landfall</u></p> <p>The landfall location was influenced from the onset of the Project design process by the presence of designated sites, specifically Leiston-Aldeburgh SSSI. Further detail is provided in Chapter 4 Site Selection and Assessment of Alternatives (APP-052).</p> <p>The Project has committed to the use of a trenchless technique (refer to Chapter 6 Project Description) at the landfall to minimise potential impacts to onshore ecology receptors. Furthermore, the landfall trenchless technique temporary working area is located inland from the SSSI boundary and the trenchless technique exit pit will be at sea. There will also be no requirement for vehicular access onto the beach at this location. Therefore, there will be no potential for any interaction with the SSSI through the use of the trenchless technique. The final landfall construction methodology will be detailed within the Landfall Construction Method Statement (CMS) produced post-consent to discharge Requirement 13 of the draft DCO (APP-023).</p> <p><u>Onshore Cable Corridor Construction Technique</u></p> <p>The onshore cables will be installed underground to minimise operational impacts to ecological receptors and landscape and visual impacts.</p> <p>Where appropriate, construction work areas would be accessed using existing tracks and road (to be developed as part of the Construction Traffic Management Plan). An Outline Construction Traffic Management Plan (APP-586) has been submitted with the Application, with a final version to be approved post consent to discharge Requirement 28 of the draft DCO (APP-023).</p> <p>When using an open cut methodology, the Applicant has committed to a reduced onshore cable route working width of 16.1m (reduced from 32m) when crossing</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>important hedgerows specified in the DCO and when crossing the woodland west of Aldeburgh Road. In addition, reinstatement of all temporary working areas will be carried out to agreed specifications.</p> <p><u>Maintenance and Operational Measures</u></p> <p>Suitable maintenance of any newly planted sections of hedgerow, shelterbelts and woodlands following construction would have an aftercare period of ten years. One for one replacement planting of failed plants would be required for the first ten years at the substation site and five years at all other locations.</p> <p>Lighting sensitive to bats would be incorporated according to guidance in Bats and Artificial Lighting in the UK (Bat Conservation Trust (BCT) and Institute of Lighting Engineers (ILE) 2018).</p> <p><u>Summary of Impact Assessment and Conclusions</u></p> <p>The impact assessment splits out impacts associated with the landfall, onshore cable corridor and the onshore substation and national grid infrastructure. Additionally, impacts during the construction (section 22.6.1), operation and maintenance (section 22.6.3) and decommissioning (section 22.6.2) phases are assessed separately.</p> <p>The potential impacts on habitats that were assessed include: disturbance to and loss of habitat types during the construction phase as well as temporary and permanent loss of habitat from construction of the Project infrastructure.</p> <p>The species impact assessment considers construction disturbance, temporary or permanent loss of foraging grounds, impacts on for example badger setts or bat roosting areas.</p> <p>Potential impacts to habitats and species are (with one exception) all assessed as being of no greater than minor adverse significance in EIA terms after mitigation has been applied. This is with the exception of potential construction impacts on bats which</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			were assessed as being moderate adverse in the short term and minor adverse in the long term (see section 22.6.1.9 Chapter 22 Onshore Ecology (APP-070) for the full assessment of the potential impacts of the Project on bats).
002	Impact to designated sites	RR-018, RR-021, RR-025, RR-041, RR-042, RR-068, RR-071, RR-076, RR-093, RR-095, RR-096, RR-098, RR-100, RR-102, RR-105, RR-106, RR-109, RR-111, RR-113, RR-114, RR-116, RR-120, RR-123, RR-131, RR-132, RR-133, RR-136, RR-137, RR-138, RR-139, RR-142, RR-152, RR-158, RR-159, RR-166, RR-169, RR-172, RR-173, RR-181, RR-182, RR-184, RR-185, RR-186, RR-188, RR-193, RR-195, RR-203, RR-204, RR-208, RR-217, RR-220, RR-223, RR-224, RR-225, RR-232, RR-234, RR-238, RR-244, RR-246, RR-249, RR-250, RR-254, RR-252, RR-256, RR-261, RR-263, RR-267, RR-268, RR-269, RR-270, RR-272, RR-274, RR-277, RR-282, RR-292, RR-295, RR-298, RR-299, RR-300, RR-305, RR-308, RR-312, RR-313, RR-314, RR-316, RR-317, RR-319, RR-322, RR-326, RR-332, RR-336, RR-343, RR-344, RR-351, RR-354, RR-356, RR-358, RR-359, RR-361, RR-364,	<p>The Applicant notes queries raised in Relevant Representations regarding potential impacts on designated sites.</p> <p>Potential impacts on designated sites are assessed in section 22.6.1 of Chapter 22 Onshore Ecology (APP-070) noting that impacts on SPAs are assessed in full in Chapter 23 Onshore Ornithology (APP-071) and section 3 of the Information to Support Appropriate Assessment Report (APP-043).</p> <p>The designated site mitigation measures described in the above row should be read in conjunction with the following summary of the potential impact on designated sites.</p> <p><u>Landfall</u></p> <p>The Leiston-Aldeburgh SSSI overlaps with the part of the coastline where landfall works are expected. The landfall works comprise trenchless technique activities that will launch from an onshore trenchless technique entry pit temporary working area (located outside the Leiston and Aldeburgh SSSI) out to an exit point at sea. The Applicant has committed to use of trenchless techniques at the landfall, which avoids any interaction with Leiston-Aldeburgh SSSI, i.e. no requirement for vehicular beach access. Impacts associated with nutrient nitrogen deposition caused by construction traffic are below the 1% Critical Load range at all transect locations, including those closest to the road network at the Leiston-Aldeburgh SSSI.</p> <p>As such, the intertidal features of the Leiston-Aldeburgh SSSI would not be affected directly or indirectly by landfall construction activities. As such, no change to Leiston-Aldeburgh SSSI is predicted during the landfall construction works.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-367, RR-368, RR-369, RR-370, RR-372, RR-378, RR-381, RR-383, RR-388, RR-389, RR-390, RR-393, RR-394, RR-395, RR-399, RR-400, RR-403, RR-404, RR-412, RR-421, RR-427, RR-429, RR-434, RR-437, RR-439, RR-440, RR-441, RR-444, RR-445, RR-446, RR-447, RR-448, RR-449, RR-453, RR-454, RR-457, RR-465, RR-467, RR-468, RR-471, RR-475, RR-484, RR-491, RR-500, RR-502, RR-504, RR-505, RR-506, RR-520, RR-528, RR-531, RR-542, RR-543, RR-544, RR-546, RR-547, RR-552, RR-554, RR-555, RR-559, RR-560, RR-564, RR-565, RR-571, RR-573, RR-577, RR-578, RR-585, RR-587, RR-589, RR-593, RR-599, RR-600, RR-605, RR-608, RR-610, RR-625, RR-627, RR-631, RR-633, RR-634, RR-635, RR-644, RR-645, RR-646, RR-648, RR-649, RR-652, RR-653, RR-655, RR-666, RR-668, RR-669, RR-673, RR-677, RR-682, RR-684, RR-688, RR-691, RR-692, RR-694, RR-697, RR-699, RR-700, RR-706, RR-707, RR-708, RR-709, RR-711, RR-715, RR-721, RR-724, RR-727, RR-728, RR-729, RR-731,	<p>Sizewell Marshes SSSI comprises water dependent habitats and associated bird assemblages, located 2.4km north of the landfall area. There is no direct overlap with the onshore development area and therefore no direct impacts associated with the landfall construction. Following assessment of the Project traffic flows, impacts associated with nutrient nitrogen deposition caused by construction traffic are below the 1% Critical Load range at all transect locations, including those closest to the road network at the Sizewell Marshes SSSI. Further detail is provided in Chapter 19 Air Quality. Therefore, there is no mechanism for indirect impacts to this site. As such, no changes to Sizewell Marshes SSSI are predicted during the landfall construction works.</p> <p><u>Onshore Cable Corridor</u></p> <p>The onshore cable corridor is located partly within the Sandlings SPA and component Leiston-Aldeburgh SSSI. Mitigation measures to limit impacts on these sites are described in the above 001 row. A description of the assessment of potential impacts on the Sandlings SPA is provided in the onshore ornithology response (see Table 19).</p> <p>There is the potential for indirect (disturbance) impacts on bird species associated with Minsmere to Walberswick Ramsar and SPA, and Alde-Ore Estuary Ramsar and SPA during onshore cable route construction works. However, cable installation construction noise and human presence at these distances (1.98km north and 1.98km south respectively) are not considered to represent any disturbance risk to the relevant qualifying species using those sites. As noted above, there will be no impact from nitrogen deposition on designated sites caused by construction traffic. Overall no changes are predicted at these two sites.</p> <p><u>Onshore Substation</u></p> <p>There are no statutory designated sites within 2km of the onshore substation and National Grid infrastructure. Grove Wood which is on the boundary of the onshore development area is designated as ancient woodland which is a non-statutory</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-735, RR-739, RR-740, RR-741, RR-743, RR-744, RR-746, RR-749, RR-751, RR-752, RR-757, RR-763, RR-764, RR-766, RR-768, RR-773, RR-775, RR-776, RR-778, RR-779, RR-784, RR-793, RR-794, RR-797, RR-798, RR-790, RR-795, RR-801, RR-802, RR-803, RR-811, RR-812, RR-816, RR-820, RR-822, RR-824, RR-826, RR-827, RR-831, RR-835, RR-837, RR-840, RR-842, RR-846, RR-848, RR-850, RR-851, RR-855, RR-857, RR-859, RR-863, RR-864, RR-865, RR-866, RR-868, RR-870, RR-873, RR-874, RR-876, RR-879, RR-880, RR-891, RR-892, RR-897, RR-899, RR-902, RR-907, RR-908, RR-909, RR-911, RR-912, RR-916, RR-917, RR-918,	designation. This woodland will be retained and therefore, there will be no change to this non-statutory designated site. See Table 33 for more detail on impact to woodland.
003	Impact to hedgerows	RR-010, RR-086, RR-100, RR-153, RR-154, RR-182, RR-203, RR-225, RR-333, RR-350, RR-367, RR-383, RR-393, RR-421, RR-436, RR-445, RR-537, RR-649, RR-662, RR-691, RR-794, RR-803, RR-821, RR-851, RR-899, RR-901	<p>The Applicant notes queries raised in Relevant Representations regarding potential impacts on hedgerows.</p> <p>Potential impacts on hedgerows are assessed in section 22.6.1.6 of Chapter 22 Onshore Ecology (APP-070).</p> <p>76 hedgerows were identified within the onshore development area. When using an open cut methodology, the Applicant has committed to a reduced onshore cable route working width of 16.1m (reduced from 32m) where possible when crossing important hedgerows specified within the draft DCO (APP-023).</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>An OLEMS (APP-584) has been submitted with the Application and provides a detailed hedgerow schedule. The OLEMS (APP-584) outlines the requirement for landscape and ecological mitigation measures that are reflective of the surveys and impact assessment carried out for the onshore infrastructure of the Project.</p> <p>A final detailed Landscape Management Plan (LMP) and Ecological Management Plan (EMP) will be produced post-consent which will be approved by the LPA in order to discharge requirements 14 and 21 of the draft DCO (APP-023) which state that these plans must be produced in accordance with the OLEMS.</p> <p>As a worst case scenario, it is assumed that the construction phase could result in the majority of the hedgerow identified above being temporarily lost in the medium to long term whilst they become re-established.</p> <p>Additional mitigation measures relevant to hedgerows that are detailed within the OLEMS and which will be implemented through the LMP are as follows:</p> <ul style="list-style-type: none"> • Temporarily lost hedgerows will be reinstated post-construction; • Hedgerows will be reinstated as soon as possible in the construction programme; • A mitigation plan will be produced as part of the EMP and agreed with Natural England prior to the removal of hedgerows, as secured under the requirements of the draft DCO; • Protection against grazing animals will be provided; • Improvement of hedgerows immediately adjacent to the removed sections where possible; • Pre-construction assessment of all trees (in hedges) to be removed by a suitably qualified arboriculturalist; and • Hedgerow root protection areas to be fenced off during construction, where relevant.

Applicant's Comments on Relevant Representations

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No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			Through application of the above mitigation the impact assessment on hedgerows concluded an impact of minor adverse significance in EIA terms.



2.19 Onshore Ornithology

Table 19 Applicant's Comments on Onshore Ornithology

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General impacts	RR-027, RR-044, RR-068, RR-069, RR-070, RR-100, RR-102, RR-106, RR-112, RR-121, RR-148, RR-154, RR-160, RR-166, RR-172, RR-173, RR-184, RR-195, RR-199, RR-200, RR-202, RR-203, RR-204, RR-215, RR-221, RR-223, RR-230, RR-242, RR-243, RR-244, RR-247, RR-250, RR-261, RR-262, RR-268, RR-276, RR-279, RR-280, RR-282, RR-292, RR-312, RR-319, RR-324, RR-326, RR-336, RR-338, RR-339, RR-344, RR-366, RR-369, RR-373, RR-374, RR-377, RR-383, RR-398, RR-403, RR-408, RR-414, RR-418, RR-419, RR-430, RR-434, RR-436, RR-437, RR-443, RR-447, RR-448, RR-449, RR-453, RR-454, RR-467, RR-471, RR-474, RR-479, RR-480, RR-491, RR-496, RR-497, RR-499, RR-512, RR-513, RR-511, RR-528, RR-529, RR-534, RR-540, RR-541, RR-552, RR-554, RR-562, RR-567, RR-568, RR-573, RR-577, RR-579, RR-586, RR-595, RR-596, RR-597, RR-599,	<p>The Applicant notes queries raised in Relevant Representations regarding general impacts on onshore ornithology.</p> <p>Chapter 23 Onshore Ornithology (APP-071) provides an assessment of onshore ornithology impacts associated with the landfall, onshore cable corridor, onshore substation and National Grid substation. The assessment of likely impacts was applied to 'scoped in' (species included in the assessment as agreed with Natural England) Important Ornithological Features (IOFs) of medium or high nature conservation importance which were recorded within the onshore ornithology study area (see section 23.3.1 of the chapter) and are known to be present within or adjacent to the onshore development area (as confirmed through survey results and desk studies). These species are listed in Table 23.17 of the chapter and include barn owl, nightingale, nightjar, turtle dove, marsh harrier (associated with the Minsmere to Walberswick Special Protection Area (SPA)) and woodlark.</p> <p>A number of potential impacts for each species are considered in the assessment for the construction, operation and decommissioning phases of the development (see section 23.6 of the chapter). These potential impacts include habitat loss, construction disturbance, disturbance from maintenance activities and disturbance to birds from operational lighting and noise.</p> <p>The Applicant has proposed a number of mitigation measures to reduce the impact on bird species including a turtle dove feeding habitat creation initiative within the onshore development area (see section 6.3.4.1 of the OLEMS (APP-584) for more details).</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-605, RR-611, RR-612, RR-613, RR-616, RR-617, RR-622, RR-625, RR-626, RR-628, RR-629, RR-630, RR-633, RR-640, RR-644, RR-646, RR-647, RR-649, RR-662, RR-664, RR-673, RR-682, RR-684, RR-685, RR-690, RR-697, RR-706, RR-708, RR-716, RR-720, RR-732, RR-740, RR-764, RR-772, RR-775, RR-776, RR-778, RR-788, RR-791, RR-794, RR-801, RR-802, RR-816, RR-818, RR-819, RR-821, RR-837, RR-849, RR-851, RR-852, RR-859, RR-878, RR-891, RR-893, RR-905, RR-907, RR-912, RR-916	<p>The OLEMS (APP-584) has been submitted with the Application. The OLEMS (APP-584) outlines the requirement for ecological (including ornithological) mitigation measures that are reflective of the surveys and impact assessment carried out for the onshore infrastructure of the Project.</p> <p>A final detailed Ecological Management Plan (EMP) will be produced post-consent which will be approved by the LPA in consultation with Natural England in order to discharge Requirement 21 of the draft DCO (APP-023) which includes provision for a Breeding Bird Protection Plan (BBPP) that will ensure that the nests, eggs and young of any bird species are protected. Detail with regard to mitigation measures and the content of the BBPP is given in the OLEMS (APP-584) submitted with the Application. As per Requirement 21 of the draft DCO (APP-023) these plans must be in accordance with the OLEMS.</p> <p>Through submission and approval of the final EMP, the ecological management associated with the construction of the onshore infrastructure will be formally controlled and implemented.</p> <p>Following mitigation (where required), no impacts were assessed as being greater than minor adverse and are therefore not significant in EIA terms.</p>
002	Impacts on the Sandlings SPA / Sandlings heath.	RR-042, RR-068, RR-070, RR-701, RR-100, RR-102, RR-109, RR-113, RR-114, RR-120, RR-136, RR-137, RR-166, RR-172, RR-173, RR-180, RR-221, RR-223, RR-224, RR-242, RR-246, RR-250, RR-252, RR-261, RR-262, RR-267, RR-268, RR-292, RR-305, RR-326, RR-336, RR-357, RR-376, RR-398, RR-403, RR-429, RR-434, RR-436, RR-437, RR-453,	<p>The Applicant notes queries raised in Relevant Representations regarding impacts on the Sandlings SPA and Sandlings Heath.</p> <p>Impacts on nightjar and woodlark (qualifying species of the Sandlings SPA) with respect to habitat loss and disturbance impacts are assessed within sections 23.6.3.1 and 23.6.3.2 of Chapter 23 Onshore Ornithology (APP-071) respectively. This includes consideration of populations within the Sandlings SPA. In addition, section 3.3 of the Information to Support Appropriate Assessment Report (APP-043) provides the information for the Secretary of State to determine</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-454, RR-462, RR-467, RR-474, RR-491, RR-499, RR-504, RR-528, RR-543, RR-552, RR-554, RR-555, RR-562, RR-577, RR-586, RR-599, RR-605, RR-617, RR-626, RR-633, RR-644, RR-669, RR-682, RR-684, RR-685, RR-697, RR-706, RR-708, RR-778, RR-786, RR-801, RR-802, RR-816, RR-827, RR-840, RR-859, RR-879, RR-880, RR-892, RR-916, RR-918	<p>whether there is likely to be an adverse effect on the integrity of the Sandlings SPA due to the potential effects of the Project.</p> <p>Regarding the crossing of the Sandlings SPA, the Applicant's preference is for an open-cut trenching technique. As noted in section 22.6.1.1.2 of Chapter 22 Onshore Ecology (APP-070) the onshore cable route will cross the Sandlings SPA at its narrowest point, towards the north of the SPA and the Applicant has committed to a reduced onshore cable route working width of 16.1m (reduced from 32m) within the SPA to minimise habitat loss.</p> <p>The seasonal restriction on construction works during the breeding bird season will be included within the Breeding Bird Protection Plan (BBPP) and SPA crossing method statement which requires to be included within the final Ecological Management Plan (EMP) to be submitted to the Local Planning Authority for approval in accordance with Requirement 21 of the draft DCO (APP-023) and on which the relevant statutory nature conservation body will be consulted. It is noted that the seasonal restriction proposed by the Applicant applies to works associated with crossing the SPA only.</p> <p>As noted within Table 5.4 of the OLEMS (APP-584), should a requirement for works to be undertaken within or adjacent to the SPA (within a 200m buffer) during the breeding bird season be identified, Natural England will require breeding bird surveys to be undertaken to determine the presence/absence of breeding birds and to be consulted on this. Again, this is secured through the BBPP which requires to be included within the final EMP to be submitted to the Local Planning Authority for approval in accordance with Requirement 21 of the draft DCO (APP-023).</p> <p>The Applicant has proposed additional mitigation measures in the form of targeted management following recommended guidelines with the aim of providing optimal habitat for breeding nightingale (see section 6.3.4.2 of the OLEMS (APP-584) for more details). Note that nightingale is not a qualifying feature of the Sandlings SPA</p>

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			<p>and that although no significant impacts were identified on species nightjar and woodlark, the additional mitigation proposed for nightingale would also benefit these species.</p> <p>The Information to Support Appropriate Assessment report (APP-043) concluded that for both woodlark and nightjar the Project and in-combination (equivalent to cumulative) impact would not result in an adverse effect on integrity of the Sandlings SPA regardless of whether both Projects were constructed concurrently or sequentially.</p>

2.20 Policy and Legislation

Table 20 Applicant's Comments on Policy and Legislation

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Over-arching policy drivers and need for the projects	RR-101, RR-144, RR-196, RR-199, RR-222, RR-287, RR-297, RR-301, RR-323, RR-356, RR-416, RR-428, RR-438, RR-513, RR-535, RR-567, RR-631, RR-655, RR-656, RR-674, RR-698, RR-713, RR-714, RR-748, RR-786, RR-788, RR-789, RR-803, RR-824, RR-839, RR-853, RR-854, RR-858, RR-861, RR-872, RR-877, RR-917	<p>The Applicant notes comments within the relevant representations regarding the policy drivers and need for the Project.</p> <p>Over-arching policy drivers and need for the Project is covered in Chapter 2 Need for the Project (APP-050), Chapter 3 Policy and Legislative Context (APP-051) and section 5 of the Development Consent and Planning Statement (APP-579).</p> <p>The key drivers are twofold - to achieve energy security at the same time as dramatically reducing greenhouse gas emissions:</p> <ul style="list-style-type: none"> Closures of existing energy generation (most notably coal and nuclear) is expected to intensify, with losses of 19 – 22GW by 2025 (BEIS, 2018¹²) whilst overall electricity demand is likely to rise during the 2020s as a greater proportion of the UK's heat and transportation systems electrify. In 2019 the UK Government updated the target set in the Climate Change Act 2008 to net zero greenhouse gas emissions by 2050. <p>To meet these twin goals there have been a series of policies and commitments from the UK Government such as The Clean Growth Strategy (BEIS, 2017¹³) which</p>

¹² Department for Business, Energy and Industrial Strategy 2017 UK Provisional Greenhouse Gas Emissions. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695929/2017_Provisional_emissions_statistics_one_page_summary_1.pdf [Accessed 21/05/2020].

¹³ Department for Business, Energy and Industrial Strategy (BEIS) (2017). The Clean Growth Strategy. Leading the way to a low carbon future. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf [Accessed 21/05/2020].

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>sets out how the UK Government intends to decarbonise all sectors of the UK economy through the 2020s. The UK offshore wind sector committed to a sector deal which targets an increase offshore wind capacity to 30GW by 2030, which represents an increase from the approximately 8GW currently deployed today. In December 2019, the Government increased the target to 40GW from offshore wind by 2030.</p> <p>The Project will have a generating capacity estimated at 900 Mega Watts (MW¹⁴) and has the potential to make a substantial contribution to UK 2030 energy targets by meeting approximately 2.25¹⁵% of the UK offshore wind cumulative deployment target for 2030.</p> <p>Moreover, the Project would have a direct positive impact by securing renewable energy supply for the equivalent of approximately 800,000¹⁶ UK households. The Project would reduce carbon emissions and contribute to the economy by providing jobs during all phases of its lifetime. The scale of this ambition is possible due to the costs of offshore wind falling significantly in the last decade, driven by competitive allocation of support, technological innovation and reductions in the cost of capital due to the risk profile coming down, which has brought benefits to UK energy consumers and enhanced competitiveness which in turn supports the viability of the Project.¹⁷</p>

¹⁴ As measured at point of connection of the onshore cables to the onshore substation.

¹⁵ Based on 900MW / 40,000MW x 100

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

¹⁷ Page 27 of UK Government Offshore Wind Sector Deal https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf



2.21 Project Description – Construction Strategy

Table 21 Applicant's Comments on Project Description - Construction Strategy

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Construction strategy	RR-023, RR-027, RR-028, RR-043, RR-069, RR-070, RR-080, RR-087, RR-088, RR-095, RR-105, RR-144, RR-145, RR-162, RR-190, RR-192, RR-195, RR-200, RR-202, RR-204, RR-225, RR-238, RR-262, RR-272, RR-273, RR-283, RR-299, RR-300, RR-308, RR-339, RR-340, RR-358, RR-359, RR-361, RR-388, RR-415, RR-421, RR-427, RR-445, RR-446, RR-448, RR-468, RR-499, RR-502, RR-506, RR-537, RR-540, RR-541, RR-545, RR-546, RR-552, RR-558, RR-565, RR-568, RR-601, RR-610, RR-611, RR-612, RR-622, RR-626, RR-664, RR-668, RR-715, RR-720, RR-721, RR-725, RR-745, RR-746, RR-770, RR-777, RR-804, RR-808, RR-836, RR-849, RR-885, RR-888, RR-902, RR-905.	<p>Section 6.9.1 of Chapter 6 Project Description (APP-054) presents the following indications of construction durations for each element of the project (the final durations will be determined by the design and construction strategy post-consent):</p> <ul style="list-style-type: none"> Onshore Preparation Works: up to 15 months. Landfall: up to 12 months. Onshore Cable Route: up to 24 months. Onshore Substation: up to 30 months. National Grid Substation: up to 48 months. National Grid Overhead Line Realignment Works: up to 12 months undertaken within a period of 36 months. Commissioning and Reinstatement: up to 12 months. <p>Plate 6.32 within Chapter 6 Project Description presents an indicative onshore cable route construction sequence which illustrates the periodic nature of construction at each of the four sections of onshore cable route.</p> <p>The East Anglia TWO offshore windfarm project and East Anglia ONE North offshore windfarm project are two separate projects which are the subject of two separate applications. The draft Development Consent Orders (DCOs) require each project to commence construction within seven years of the date of the DCOs coming into force.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>At this stage it is not known whether both Projects would be constructed simultaneously or with a construction gap. Therefore, the onshore topic assessments within each environmental statement include two cumulative assessment scenarios which are considered to represent the two worst case scenarios for construction of the onshore infrastructure. These are:</p> <ul style="list-style-type: none"> Scenario 1 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built simultaneously (at the same time); and Scenario 2 assesses the impacts of the proposed East Anglia TWO project and East Anglia ONE North project being built with a construction gap. <p>Scenario 1 assumes that the landfall, onshore cable corridor and onshore substation construction periods for the two Projects occur over the same period as would have occurred for a single project (the anticipated programme is presented in section 6.9 of Chapter 6 Project Description and is summarised above.</p> <p>Scenario 2 assumes onshore construction of the first project and its full re-instatement, followed by the construction of the second project at a later date. The construction duration of each project is as illustrated above. These cumulative assessment scenarios also ensure that a partial overlap in project construction has been fully assessed within the Environmental Statement (ES).</p> <p>In fully assessing the above scenarios within each ES, the Applicants retain the necessary flexibility to adopt the optimum delivery solution for each project which reflects the supply chain constraints and opportunities at the time.</p>



2.22 Project Description – Size of Substations

Table 22 Applicant's Comments on Project Description - Size of Substations

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Size of substations	RR-027, RR-042, RR-044, RR-080, RR-088, RR-089, RR-094, RR-104, RR-106, RR-108, RR-113, RR-127, RR-128, RR-129, RR-143, RR-145, RR-146, RR-155, RR-162, RR-166, RR-169, RR-173, RR-174, RR-178, RR-184, RR-189, RR-190, RR-193, RR-194, RR-195, RR-196, RR-198, RR-199, RR-200, RR-202, RR-213, RR-214, RR-222, RR-225, RR-233, RR-234, RR-242, RR-243, RR-246, RR-252, RR-253, RR-258, RR-280, RR-284, RR-299, RR-300, RR-302, RR-310, RR-314, RR-317, RR-319, RR-320, RR-321, RR-322, RR-323, RR-324, RR-326, RR-328, RR-330, RR-331, RR-332, RR-335, RR-337, RR-338, RR-339, RR-340, RR-341, RR-342, RR-350, RR-353, RR-363, RR-365, RR-366, RR-370, RR-374, RR-376, RR-377, RR-378, RR-382, RR-383, RR-389, RR-390, RR-403, RR-404, RR-416, RR-417, RR-424, RR-435, RR-439, RR-451, RR-452, RR-454, RR-456, RR-457, RR-458,	<p>A number of Relevant Representations make reference to the size and scale of the onshore substation and the National Grid infrastructure.</p> <p>Section 5.4 of Chapter 5 EIA Methodology (APP-053) explains the use of a project design envelope approach, also known as a 'Rochdale Envelope'. This approach is recognised by the Planning Inspectorate in their Advice Note Nine: Rochdale Envelope.</p> <p>The Rochdale Envelope comprises the maximum footprint and heights of the onshore substation and National Grid substation and ensures that the environmental impact assessment is based on the reasonable worst-case project design.</p> <p>The maximum footprint and heights are necessary to ensure that the Applicant has sufficient space within the consented project parameters to safely and efficiently design, construct and operate the onshore substation and National Grid substation. The maximum footprint required is based on the Applicant's experience of similar projects and reflects the installed capacity of the Project.</p> <p>The project design envelope for the Project is detailed in Chapter 6 Project Description (APP-054) and identifies the maximum footprint and heights of buildings and electrical equipment within the onshore substation and National Grid infrastructure. The choice of technology (i.e. Air Insulated Switchgear (AIS) or Gas Insulated Switchgear (GIS) technology) to be utilised within the National Grid substation will be made by National Grid post consent. The Application and accompanying Environmental Statement (ES) assesses the worst-case scenario for each receptor and with respect to technology solution this is AIS.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-471, RR-474, RR-477, RR-478, RR-480, RR-487, RR-491, RR-494, RR-507, RR-509, RR-513, RR-517, RR-527, RR-528, RR-529, RR-530, RR-534, RR-535, RR-341, RR-555, RR-559, RR-562, RR-563, RR-567, RR-568, RR-588, RR-596, RR-597, RR-605, RR-611, RR-617, RR-621, RR-637, RR-649, RR-664, RR-670, RR-974, RR-981, RR-982, RR-684, RR-690, RR-693, RR-694, RR-698, RR-701, RR-705, RR-708, RR-713, RR-714, RR-719, RR-726, RR-732, RR-736, RR-743, RR-746, RR-748, RR-749, RR-751, RR-760, RR-763, RR-766, RR-771, RR-772, RR-773, RR-775, RR-783, RR-786, RR-788, RR-789, RR-792, RR-804, RR-816, RR-818, RR-821, RR-823, RR-830, RR-834, RR-839, RR-841, RR-845, RR-849, RR-851, RR-852, RR-866, RR-873, RR-877, RR-883, RR-885, RR-887, RR-888, RR-889, RR-890, RR-893, RR-906, RR-910, RR-911, RR-912, RR-918.	<p>The <i>draft Development Consent Order (DCO)</i> (APP-023) also specifies the maximum heights of buildings and electrical equipment and includes a Requirement that the details of the layout, scale and external appearance of the onshore substation and National Grid substation be submitted to and approved by the relevant planning authority prior to construction of the substations commencing. This Requirement will allow any reductions in the footprint or height of the onshore substation and National Grid substation which are realised through detail design, to be communicated to the relevant planning authority and delivered through the approved scheme.</p> <p>As part of the Project's iterative design process from Scoping to Application submission, and in response to feedback throughout pre-application process, the Applicant reduced the maximum height of the onshore substation buildings from 21m to 15m, and the maximum building height within the National Grid substation (air insulated substation design) from 13m to 6m. The final design of the onshore substation and National Grid substation will adhere to these revised maximum building heights.</p> <p>The Applicant has presented comprehensive landscape screening to minimise the visual impacts of the onshore substation and National Grid substation (see <i>Outline Landscape and Ecological Management Strategy</i> (APP-584)) which reflects the worst-case footprint and size of the onshore substation and National Grid infrastructure. The <i>draft DCO</i> requires a final Landscape Management Plan to be produced post consent which will be refined to reflect the final size and footprint of the onshore substation and National Grid infrastructure.</p> <p>A number of Relevant Representations sought to compare the proposed onshore substation with that of the Rampion offshore windfarm. The Applicant notes that such comparisons are not appropriate given the significant difference in capacity of the Rampion project (400MW) compared to the East Anglia TWO project (900MW)</p>

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			<p>and East Anglia ONE North project (800MW). This significant difference in capacity is reflected in the difference in onshore infrastructure required for the Projects.</p> <p>As the East Anglia TWO project and East Anglia ONE North project are separate projects, each will require a dedicated onshore substation but will connect into a single National Grid substation.</p> <p>The Applicant has addressed Relevant Representation relating to land use within Table 11</p>



2.23 Public Rights of Way

Table 23 Applicant's Comments on Public Rights of Way

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General	RR-025, RR-027, RR-043, RR-044, RR-065, RR-068, RR-069, RR-070, RR-071, RR-089, RR-095, RR-112, RR-116, RR-132, RR-133, RR-138, RR-148, RR-149, RR-154, RR-162, RR-165, RR-169, RR-182, RR-183, RR-184, RR-185, RR-186, RR-197, RR-199, RR-200, RR-202, RR-203, RR-204, RR-210, RR-213, RR-214, RR-215, RR-220, RR-226, RR-231, RR-234, RR-243, RR-246, RR-251, RR-263, RR-278, RR-279, RR-280, RR-299, RR-300, RR-302, RR-315, RR-319, RR-320, RR-322, RR-325, RR-327, RR-330, RR-335, RR-336, RR-341, RR-343, RR-346, RR-349, RR-361, RR-363, RR-365, RR-367, RR-370, RR-374, RR-375, RR-376, RR-377, RR-383, RR-386, RR-388, RR-395, RR-400, RR-408, RR-420, RR-421, RR-424, RR-426, RR-429, RR-430, RR-436, RR-440, RR-441, RR-442, RR-445, RR-447, RR-448, RR-449, RR-450, RR-462, RR-463, RR-478, RR-479, RR-480, RR-485, RR-487, RR-490, RR-492, RR-494, RR-499, RR-507, RR-515, RR-520, RR-524, RR-526, RR-527, RR-531, RR-532, RR-540, RR-541, RR-545, RR-547, RR-557, RR-558, RR-562, RR-566, RR-568, RR-575, RR-576, RR-579,	<p>A number of Relevant Representations were made which raised concerns with regards to impacts the Project may have on Public Rights of Way (PRoW). This response explains how PRoW were assessed within the Environmental Impact Assessment (EIA) and how PRoW will be managed throughout the construction and operation of the Project.</p> <p>The Project will interact with a number of PRoW within the onshore development area during its construction and operation. PRoW include public roads and pavements, footpaths, bridleways and byways which are formally designated as PRoW by Suffolk County Council.</p> <p>PRoWs are assessed in section 30.6.1.4.2.1 of Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). There are 26 PRoW for which management measures are required, which will allow them to be used throughout construction and two at the substation site which will require permanent diversion.</p> <p>The Outline Public Rights of Way Strategy (APP-581) outlines the management principles to be adopted in ensuring that PRoW are managed in a safe and appropriate manner during construction and operation. Timings of closures and diversions are discussed in section 23.3 and 3.3 of the Outline Public Rights of Way Strategy (APP-581).</p> <p>Precise details for the management of each PRoW, including the specification of any PRoW temporary diversions required during construction works, will be agreed with the Local Planning Authority (following consultation with the Local Highway Authority) through approval of the final PRoW</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-581, RR-584, RR-586, RR-589, RR-591, RR-598, RR-604, RR-605, RR-637, RR-639, RR-640, RR-644, RR-647, RR-649, RR-650, RR-654, RR-666, RR-677, RR-679, RR-685, RR-690, RR-691, RR-694, RR-701, RR-702, RR-704, RR-710, RR-713, RR-714, RR-715, RR-718, RR-719, RR-720, RR-723, RR-731, RR-735, RR-736, RR-741, RR-743, RR-749, RR-753, RR-755, RR-759, RR-768, RR-770, RR-771, RR-772, RR-773, RR-775, RR-776, RR-781, RR-783, RR-784, RR-794, RR-797, RR-804, RR-805, RR-814, RR-815, RR-816, RR-818, RR-819, RR-821, RR-828, RR-829, RR-831, RR-834, RR-847, RR-848, RR-849, RR-851, RR-870, RR-873, RR-877, RR-882, RR-884, RR-889, RR-890, RR-892, RR-893, RR-895, RR-903, RR-907, RR-908, RR-909.	<p>Strategy prior to commencement of any stage of the authorised development that would affect a PRoW specified in Schedule 3 or 4 of the draft DCO (APP-023).</p> <p>Timings of closures and diversions are discussed in section 3.3 of the Outline Public Rights of Way Strategy (APP-581).</p>
002	Temporary closures / diversions of PRoW	RR-025, RR-027, RR-042, RR-043, RR-044, RR-065, RR-069, RR-070, RR-089, RR-096, RR-098, RR-100, RR-102, RR-105, RR-106, RR-116, RR-132, RR-133, RR-138, RR-139, RR-148, RR-149, RR-151, RR-154, RR-160, RR-162, RR-166, RR-169, RR-172, RR-173, RR-188, RR-204, RR-208, RR-215, RR-220, RR-221, RR-223, RR-224, RR-231, RR-238, RR-242, RR-244, RR-246, RR-252, RR-272, RR-280, RR-292, RR-295, RR-296, RR-298, RR-299, RR-300, RR-302, RR-308, RR-315,	<p>A number of Relevant Representations raised concerns regarding temporary closures / diversions of PRoW, particularly with regards to the appropriateness of the proposed diversion, potential impact on users' safety and potential impacts on tourism.</p> <p>Potential temporary diversion routes and closures have been proposed, and the PRoW to be temporarily stopped up / diverted are shown in the Temporary Stopping up of Public Rights of Way Plan (APP-013). Table 2.1 in the Outline Public Rights of Way Strategy (APP-581) details the proposed management measures for PRoW requiring temporary control</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-319, RR-320, RR-322, RR-325, RR-326, RR-327, RR-330, RR-341, RR-343, RR-349, RR-350, RR-354, RR-357, RR-358, RR-359, RR-364, RR-367, RR-368, RR-378, RR-382, RR-386, RR-388, RR-403, RR-405, RR-406, RR-427, RR-437, RR-439, RR-442, RR-443, RR-444, RR-445, RR-446, RR-447, RR-448, RR-449, RR-454, RR-461, RR-467, RR-468, RR-472, RR-474, RR-476, RR-477, RR-487, RR-492, RR-498, RR-527, RR-528, RR-540, RR-541, RR-544, RR-546, RR-552, RR-558, RR-559, RR-577, RR-579, RR-598, RR-599, RR-604, RR-610, RR-617, RR-619, RR-621, RR-626, RR-633, RR-637, RR-644, RR-649, RR-652, RR-653, RR-677, RR-682, RR-684, RR-701, RR-706, RR-708, RR-709, RR-719, RR-721, RR-736, RR-741, RR-743, RR-747, RR-766, RR-786, RR-788, RR-790, RR-798, RR-801, RR-802, RR-803, RR-811, RR-821, RR-827, RR-840, RR-851, RR-859, RR-864, RR-865, RR-866, RR-874, RR-876, RR-902, RR-916, RR-918.	<p>measures during construction. Temporary management measures may include:</p> <ul style="list-style-type: none"> • Appropriately fenced (unmanned) crossing points; • Manned crossing points; and • Temporary diversions. <p>Precise details for the management of each PRoW, including the specification of any PRoW temporary diversions during construction works, will be agreed with the Local Planning Authority (following consultation with the Local Highway Authority) through approval of the final PRoW Strategy, prior to commencement of any stage of the authorised development that would affect a PRoW specified in Schedule 3 of the draft DCO (APP-023).</p> <p>Article 11 of the draft DCO requires the alternative right of way to be in place to the reasonable satisfaction of the Local Highway Authority before the existing PRoW can be temporarily stopped up.</p> <p>Relevant County, District and Parish Councils would be notified approximately 4 – 6 weeks in advance of any temporary closure.</p> <p>Temporary diversions will involve a short diversion around construction works, allowing construction works to progress in the area of the original PRoW. Once these construction works (or a phase of construction works) are complete, the PRoW would be reinstated along its original route. Depending on the nature and timing of the construction works this temporary diversion arrangement may be implemented a number of times during construction.</p> <p><u>Adequacy of Proposed Temporary Diversions and User Safety</u></p> <p>The Applicant considers the proposed temporary diversions to be adequate for the purposes of the Application. It should be noted that all proposed</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>PRoW temporary diversions, and any amendments to them, will be discussed with the Local Planning Authority PRoW officer through the Statement of Common Ground process. The Applicant will consult with the Local Planning Authority PRoW officer in advance of approval of the final PRoW Strategy, prior to commencement of any stage of the authorised development that would affect a PRoW specified in Schedule 3 of the draft DCO (APP-023)</p> <p>All temporary PRoW closures and diversions will be managed in a safe and appropriate manner during the construction and operational phases of the Project. As detailed within section 2.2 of the Outline PRoW Strategy, safety measures will be implemented at any PRoW where haul roads or other construction related activities cross a PRoW, additional control measures are also included within section 2.2.</p> <p><u>Potential Impacts on Tourism</u></p> <p>PRoWs are assessed in section 30.6.1.4.2.1 of Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). The impact of onshore construction on visitor perception is assessed as having negligible significance for the project. Cumulatively, it is considered that both Projects will not have significant impacts upon visitor perception of the area during construction.</p> <p>The Suffolk Coast Path PRoW crosses the onshore development area at the landfall location. Construction works at this location are restricted to underground works only (specifically trenchless technique), therefore there is no interaction between the Project and the PRoW and no temporary control measures are required.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
003	Permanent closures of PRoW	RR-132, RR-133, RR-148, RR-149, RR-162, RR-195, RR-322, RR-445, RR-252, RR-336, RR-357, RR-649, RR-736, RR-743, RR-759, RR-851.	<p>A number of Relevant Representations raised concerns regarding the permanent closures of PRoW.</p> <p>There are two PRoW within the onshore development area which interact with the Project on a permanent basis during construction and operation. These will require permanent stopping-up and diversion (as listed in Table 3.1 in the Outline Public Rights of Way Strategy (APP-581) and as shown on the Permanent Stopping up of Public Rights of Way Plan (APP-014).</p> <p>Precise details for the management of these PRoW will be agreed with the Local Planning Authority (following consultation with the Local Highway Authority) through approval of the final PRoW Strategy, prior to commencement of any stage of the authorised development that would affect a PRoW specified in Schedule 4 of the draft DCO (APP-023).</p> <p>As set out in Article 10 of the draft DCO, the existing PRoW cannot be extinguished until the Local Highway Authority confirms that the alternative PRoW has been created to the standard defined in the final PRoW Strategy.</p> <p>As described in section 3.5.13 of the Outline Landscape and Ecological Mitigation Strategy (OLEMS) (APP-584), a Landscape Management Plan (LMP) will be produced prior to construction which will seek to deliver gains for public amenity by including enhanced access through PRoW proposals.</p> <p>Users of the PRoW network around the onshore substation will be given the option of diverted routes, and therefore will retain the option to walk around the area on longer, medium or shorter routes.</p> <p>It should be noted that all proposed PRoW permanent diversions will be discussed with the Local Planning Authority PRoW officer through the Statement of Common Ground process. The Applicant will consult with the Local Planning Authority PRoW officer in advance of approval of the final</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			PRoW Strategy, prior to commencement of any stage of the authorised development that would affect a PRoW specified in Schedule 4 of the draft DCO (APP-023).
004	Closure of footpath running from the village of Friston to Little Moor Farm.	RR-132, RR-133, RR-148, RR-149, RR-162, RR-195, RR-322, RR-445, RR-649, RR-736, RR-743, RR-759, RR-851.	<p>An area of concern raised in some Relevant Representations is with regard to the closure of the footpath running from the village of Friston to Little Moor Farm.</p> <p>The assessment of impacts upon this specific PRoW from the project is presented within section 30.6.1.4.2.1 of Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). It identifies that there are two PRoW in the location of the onshore substation and National Grid infrastructure that will require permanent diversion (ID number: E-354/006/0 and E-387/009/0). This could result in a significant impact but will be mitigated through consultation with the Local Highway Authority and approval of the final PRoW Strategy and LMP by the Local Planning Authority on permanent diversions, and landscaping (as presented within the OLEMS (APP-584) to develop an attractive footpath that walkers can enjoy. Therefore, the residual impact is negligible in the long term and minor adverse before the landscape features mature.</p> <p>Timings of permanent closures and diversions are discussed in section 3.3 of the Outline Public Rights of Way Strategy (APP-581).</p>



2.24 Site Selection – Landfall

Table 24 Applicant's Comments on Site Selection - Landfall

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Principle drivers of landfall siting	RR-025, RR-071, RR-074, RR-095, RR-101, RR-175, RR-215, RR-312, RR-382, RR-388, RR-393, RR-409, RR-483, RR-608, RR-611, RR-612, RR-630, RR-647, RR-657, RR-681, RR-684, RR-772, RR-782, RR-793, RR-849, RR-868.	<p>The Applicant notes a number of queries raised in Relevant Representations regarding the landfall site selection process.</p> <p>The location of the landfall (section 4.8 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)) is driven by the location of the offshore windfarm site (section 4.7) and the grid connection location established through the Connection and Infrastructure Options Note (CION) process (section 4.9).</p> <p>Following identification of the offshore windfarm site and the grid connection location, a constraints mapping and engineering feasibility study was conducted to identify the most appropriate location for both the Projects offshore export cables to make landfall.</p> <p>The constraints mapping identified potential landfall locations based on the following key principles:</p> <ul style="list-style-type: none"> • Avoiding areas with European, national and local ecological designations; • Avoiding landscape and cultural heritage designations; and • Areas with substantial infrastructure or land use e.g. nuclear energy land and infrastructure associated with its operation, housing and coastal defences. <p>The constraints mapping was subsequently reviewed to identify possible landfall locations between Sizewell A (Sizewell Beach) and Thorpeness.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>The engineering feasibility study reviewed these landfall options and considered beach and sea bed geology, tides and currents, fishing and anchorage interactions, potential access for cable vessels and cable protection requirements.</p> <p>Suitable offshore cable corridor and landfall locations were subsequently determined and considered factors such as:</p> <ul style="list-style-type: none"> • Environmental and policy constraints; • Avoidance of physical impacts (as far as possible) to the Coralline Crag formation; • Maximise distance (as far as possible) between offshore cable installation and EDF Energy's intake structures; • Avoid surface laid offshore cable protection or offshore cable crossings in shallow waters (<20m) as far as possible; and • Minimise interactions with existing assets. <p>The landfall location to the north of Thorpeness was deemed to be the preferred location for the following reasons:</p> <ul style="list-style-type: none"> • The landfall can accommodate onshore cable requirements for both the Projects; • Direct impacts on the SSSI designated at Sizewell Cliffs (Leiston - Aldeburgh SSSI) will be avoided through the use of trenchless techniques¹⁸;

¹⁸ A method of installation that allows ducts and cables to be installed under an obstruction without breaking open the ground and digging a trench (examples of such techniques include horizontal directional drilling, thrust boring, auger boring and pipe ramming)



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> There is potential to avoid impacts on the Coralline Crag rock formation offshore from the coastline through the use of trenchless techniques, and thereby significantly reduce or remove the potential impact on coastal processes in the area (and avoid any impacts on the safe operation of Sizewell B nuclear power station's cooling water intake and outfalls); There is sufficient space in the identified area to accommodate set back from the cliff line to reduce risk associated with coastal erosion; and Direct interaction with the beach can be avoided through the use of trenchless techniques.
002	Alternative landfall locations - Sizewell	RR-111, RR-141, RR-168, RR-175, RR-176, RR-205, RR-236, RR-315, RR-325, RR-345, RR-360, RR-372, RR-391, RR-409, RR-415, RR-457, RR-518, RR-572, RR-632, RR-696, RR-711, RR-761, RR-774, RR-782, RR-803, RR-826, RR-856, RR-860, RR-896.	<p>The Applicant notes a number of queries raised in Relevant Representations regarding alternative landfall sites, particularly at Sizewell and has provided information of how the decision to land at Thorpeness was reached.</p> <p>As outlined in section 4.8 of Chapter 4 Site Selection and Alternatives (APP-052), the initial landfall search area was identified between Sizewell Beach and Thorpeness. The area was then divided into sectors with the following sites taken forward:</p> <ul style="list-style-type: none"> North (Sizewell Beach) Centre (Sizewell Hall / Dower House) South (Thorpeness). <p>The landfall location area north of Thorpeness was chosen as it avoided interaction with the offshore Coralline Crag and interaction with operation of Sizewell B Nuclear Power Station cooling water intake / outlet and sea defences. It also allows the co-location of the Projects and reduces the total</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			amount of area directly impacted. It avoids populated areas and those at risk of coastal erosion, through sufficient space in the identified area to accommodate set back from the cliff line, as far as possible.
003	Coastal erosion and cliff instability at Thorpeness	RR-019, RR-025, RR-068, RR-074, RR-078, RR-096, RR-098, RR-100, RR-105, RR-111, RR-116, RR-120, RR-121, RR-122, RR-129, RR-131, RR-136, RR-137, RR-140, RR-143, RR-148, RR-158, RR-162, RR-163, RR-166, RR-170, RR-173, RR-176, RR-188, RR-196, RR-203, RR-204, RR-209, RR-213, RR-215, RR-217, RR-221, RR-222, RR-223, RR-224, RR-225, RR-226, RR-234, RR-236, RR-240, RR-241, RR-242, RR-244, RR-245, RR-246, RR-247, RR-249, RR-250, RR-252, RR-253, RR-254, RR-259, RR-261, RR-262, RR-263, RR-266, RR-267, RR-268, RR-269, RR-272, RR-277, RR-278, RR-285, RR-291, RR-292, RR-295, RR-296, RR-308, RR-310, RR-312, RR-319, RR-322, RR-323, RR-326, RR-328, RR-337, RR-338, RR-339, RR-348, RR-349, RR-350, RR-351, RR-354, RR-356, RR-357, RR-358, RR-359, RR-360, RR-361, RR-362, RR-366, RR-367, RR-368, RR-378, RR-381, RR-386, RR-398, RR-400, RR-403, RR-405, RR-406, RR-409, RR-413, RR-415, RR-416, RR-421, RR-425, RR-427, RR-434, RR-435, RR-436, RR-437, RR-439, RR-440, RR-441, RR-447, RR-448, RR-449, RR-450, RR-451,	<p>The Applicant notes the concerns within a number of representations regarding the coastal erosion and cliff instability at Thorpeness, and the selection of this location for the siting of the landfall.</p> <p>As described in section 4.8 of Chapter 4 Site Selection and Alternatives (APP-052), in order to assess the movement and stability of the shoreline and shallow subtidal areas, and the effects of coastal management plans over the next 50 years, a coastal stability study was commissioned (see section 2.12 of Appendix 4.6 Coastal Processes and Landfall Site Selection (APP-447)).</p> <p>The study showed that the main uncertainty associated with the coastline in the area is in terms of long term change in coastal processes, alongside change in sea levels related to climate change. It was considered that the available information allowed a good assessment of the area in terms of present day trends of erosion, but that some caution has to be taken in extrapolating these trends into the future. The study was also able to quantify appropriate set back distances from the cliff line depending on where a future landfall location is chosen. This was proposed on a conservative precautionary approach. The Applicant has committed to setting back the landfall transition bays to the potential 100-year erosion prediction line to ensure the integrity of the cliff is not compromised and to allow for natural coastal erosion (section 6.6.2 of Chapter 6 Project Description (APP-054)).</p> <p>The coastal erosion predictions for the landfall area were discussed and presented to East Suffolk Council's (ESC) coastal engineer as part of the Landfall and Coastal Processes ETG in February 2018. At that time, the Applicant received agreement from ESC that the coastal erosion predictions</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-453, RR-454, RR-461, RR-465, RR-467, RR-468, RR-474, RR-476, RR-477, RR-478, RR-491, RR-494, RR-499, RR-502, RR-504, RR-505, RR-507, RR-509, RR-516, RR-528, RR-531, RR-535, RR-545, RR-547, RR-552, RR-554, RR-555, RR-559, RR-560, RR-566, RR-567, RR-577, RR-581, RR-584, RR-586, RR-587, RR-589, RR-592, RR-593, RR-597, RR-598, RR-599, RR-614, RR-617, RR-621, RR-625, RR-626, RR-628, RR-630, RR-632, RR-633, RR-644, RR-649, RR-650, RR-652, RR-653, RR-661, RR-664, RR-667, RR-670, RR-673, RR-677, RR-682, RR-684, RR-685, RR-687, RR-692, RR-693, RR-698, RR-699, RR-706, RR-708, RR-709, RR-711, RR-715, RR-720, RR-721, RR-727, RR-747, RR-749, RR-782, RR-736, RR-746, RR-748, RR-763, RR-768, RR-773, RR-775, RR-778, RR-786, RR-788, RR-794, RR-798, RR-801, RR-802, RR-803, RR-807, RR-810, RR-811, RR-816, RR-818, RR-819, RR-821, RR-823, RR-824, RR-830, RR-834, RR-837, RR-839, RR-842, RR-847, RR-848, RR-850, RR-851, RR-852, RR-855, RR-864, RR-865, RR-866, RR-868, RR-869, RR-870, RR-873, RR-874, RR-876, RR-879, RR-880, RR-888, RR-892, RR-899, RR-900, RR-902, RR-907, RR-911, RR-912, RR-916, RR-918.	<p>were robust and that the conservative buffer for setting back the landfall transition bay area of search (Figure 6.6 (APP-101)) was appropriate.</p> <p>In May 2018, ESC's coastal engineer provided beach transect plots prepared by the Environment Agency after the late February / early March 2018 prolonged series of onshore winds. They showed updated cliff retreat data over the frontage to the north of Thorpeness Village from 2013 to March 2018. These transects were reviewed against the initial coastal erosion predictions in July 2018. The review concluded that the overall extents of erosion set out in the original report were robust when considering the more recent rates of erosion as there is no evidence that a fundamental change in the broader scale longer term processes exists. ESC's coastal engineer agreed that the data had been considered appropriately and that the conclusions of the coastal erosion predictions were robust.</p> <p>The Applicant is confident in the robustness of the coastal erosion predictions for the landfall area and has used the most up-to-date available information to determine the current rates of coastal erosion.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
004	Erosion of buried cables at landfall	RR-632, RR-589, RR-673, RR-907.	<p>The Applicant notes concerns regarding buried cables potentially becoming exposed due to coastal processes as they cross the intertidal area. The Applicant has made a decision to employ trenchless techniques to install the export cable at the landfall. Therefore, the buried cables cannot become exposed at the landfall. The export cables would make landfall just to the north of Thorpeness in Suffolk. Assessments of coastal erosion have been undertaken to ensure that the cable ducts will be installed onshore with a suitable setback distance to allow for natural coastal erosion (section 2.12 of Appendix 4.6 Coastal Processes and Landfall Site Selection (APP-447)).</p> <p>A trenchless technique will be used to install the export cable at the landfall, ensuring no impacts on the intertidal zone. Although the achievable length of the trenchless technique will be affected by limitations of cable characteristics and the drill profile (i.e. the angle of the bore), the maximum length would be 2km (section 7.3.2.6 of Chapter 7 Marine Geology, Oceanography and Physical Processes (APP-055)). There is potential to avoid impacts on the Coralline Crag rock formation offshore from the coastline through the use of a trenchless technique, and thereby significantly reduce or remove the potential impact on coastal processes in the area (section 4.8.3 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)).</p>
005	Increase in flood risk	RR-143, RR-246, RR-247, RR-254, RR-547, RR-581, RR-613	<p>The Applicant notes a number of queries raised in Relevant Representations regarding the potential for an increase in flood risk due to the landfall being at Thorpeness.</p> <p>The Project will include embedded mitigation measures to control surface runoff during the construction phase, including the creation of drainage channels to intercept water from the cable trench and onshore cable corridor. These measures, which are described in more detail in section 20.3.3 of Chapter 20 Water Resources and Flood Risk (APP-068), will help to control the release of</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>surface waters from onshore development activities and prevent changes to surface runoff and flood risk.</p> <p>In addition to the embedded mitigation measures to intercept site drainage (section 20.3.3), the potential for impacts associated with changes to surface water runoff and flood risk will be reduced by the reinstatement of existing land drains along the onshore cable route. A specialised drainage contractor will undertake surveys to locate drains and create drawings both pre- and post-construction and ensure appropriate reinstatement.</p> <p>Issues pertinent to construction phase drainage, including consideration of surface water runoff, will be managed through the development and implementation of a Surface Water and Drainage Management Plan and Flood Management Plan to be submitted to and approved by the relevant local planning authority post-consent as part of the Code of Construction Practice, as secured under Requirement 22 of the draft DCO (APP-023). Onshore works cannot commence until these plans have been approved by the relevant local planning authority.</p> <p>During the operational phase, landfall infrastructure (two underground transition bays each with an operational volume of 227m³) will be buried below ground to an approximate depth of 3m (the top of the transition bay being approximately 1.2m below ground level). There will be no above ground infrastructure (Table 20.2 of section 20.3.2 of Chapter 20 Water Resources and Flood Risk (APP-068)). Therefore, there will be no increase in flood risk at the landfall location.</p>
006	Impact to tourism industry (closure of	RR-019, RR-025, RR-042, RR-072, RR-122, RR-143, RR-174, RR-203, RR-217, RR-247, RR-262, RR-315, RR-370, RR-411, RR-566, RR-684	The Applicant notes concerns from representations regarding the potential closure of Thorpeness Beach. The Applicant is committed to trenchless techniques which removes the need for any beach closures. This is discussed in



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
	Thorpeness Beach)		section 30.6.1.4 of Chapter 30 Tourism, Recreation and Socioeconomics (APP-078) and detailed further in Chapter 6 Project Description (APP-054).
007	Impact to coastal ecology (shingle habitats)	RR-156, RR-203, RR-247, RR-250, RR-254, RR-261, RR-268, RR-291, RR-351, RR-370, RR-381, RR-421, RR-434, RR-435, RR-453, RR-504, RR-507, RR-554, RR-593, RR-692, RR-837, RR-847	The Applicant has committed to installing the export cable at the landfall using trenchless techniques, thus removing the potential for any disturbance in the intertidal and shallowest nearshore zones. Shingle habitat is a feature of the Leiston – Aldeburgh SSSI at landfall. There will be no direct or indirect impacts on the intertidal zone and coastal vegetated shingle because landfall will be made using a trenchless technique. Potential impacts to coastal ecology including shingle habitats are discussed in section 22.5.2.11 of Chapter 22 Onshore Ecology (APP-070).
008	Impact to coastal processes (enhanced erosion of Thorpeness cliffs)	RR-019, RR-191, RR-193, RR-201, RR-215, RR-246, RR-250, RR-254, RR-261, RR-267, RR-268, RR-291, RR-319, RR-381, RR-415, RR-434, RR-435, RR-443, RR-453, RR-465, RR-554, RR-560, RR-566, RR-604, RR-617, RR-684, RR-692, RR-699, RR-704, RR-716, RR-719, RR-720, RR-723, RR-778, RR-803, RR-816, RR-842, RR-842, RR-855, RR-899, RR-907	<p>The Applicant notes the concerns within a number of representations regarding the coastal erosion and cliff instability at Thorpeness, and the selection of this location for the siting of the landfall. The Applicant is confident in the robustness of the coastal erosion predictions for the landfall area and has used the most up-to-date available information to determine the current rates of coastal erosion.</p> <p>The embedded mitigation measures described in section 7.3.3 of Chapter 7 Marine Geology, Oceanography and Physical Processes (APP-055) with respect to impacts on coastal processes include:</p> <ul style="list-style-type: none"> The landfall location has been chosen and refined based on consideration of the physical process interactions and marine geology along the Suffolk coast and adjacent nearshore sea bed, including the role of the nearshore Sizewell and Dunwich banks, the outcrop of Coraline Crag offshore from Thorpeness and the rates of erosion of the Sizewell cliffs, as well as the circulatory sediment transport pathways between the shore and nearshore (see Appendix 4.6 Coastal Processes and Landfall Site Selection (APP-447). Consideration has



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>also been given to the proximity to the Sizewell nuclear power station cooling water infrastructure with respect to tidal streams. This has led to the preference for a location for cable installation towards the southern side of the cable corridor, and an extension of the original corridor further to the south in order to accommodate this.</p> <ul style="list-style-type: none"> A commitment has also been made to install the export cable at the landfall using trenchless techniques, thus minimising disturbance and avoiding the need for cable protection in the intertidal and shallowest nearshore zones. It is likely that the trenchless technique pop-out location will be to the south of the outcrop of Coralline Crag (see section 7.6.2.7). Hence, there will be no interruption of the circulatory sediment transport pathways between the coast and Sizewell Bank and there is a strong likelihood of the export cable requiring no protection measures within the closure depth of the active beach profile, due to the presence of a veneer of sand on the sea bed in this location. <p>Section 7.6.1.8 assesses the potential changes to suspended sediment concentrations and coastal morphology at the landfall location. The assessment determined no impacts on coastal morphology within the intertidal zone, and therefore no potential changes to coastal morphology that would affect the predicted erosion rates at Thorpeness Cliffs (as discussed within section 2.12 of Appendix 4.6 Coastal Processes and Landfall Site Selection (APP-447).</p>
009	Consideration of subsidence and contamination	RR-215.	<p>The Applicant notes concerns raised in Relevant Representations regarding the adequacy of the consideration of subsidence and contamination at the landfall location.</p> <p>Embedded mitigation outlined in Table 18.2 of Chapter 18 Ground Conditions and Contamination (APP-066) outlines that construction of landfall and the</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
	at landfall location		onshore cable corridor will avoid areas of historic development, including all historic pits and areas of infill land identified. Should any unanticipated contamination be encountered during the work, work should be halted in that area and a written statement on how contamination will be dealt with should be agreed with the Local Planning Authority. This is secured under Requirement 18(2) of the draft DCO (APP-023).
010	Impact to Suffolk Coast Path and Sandlings Walk	RR-025, RR-116, RR-202, RR-203, RR-292, RR-436, RR-581, RR-621, RR-684, RR-877.	<p>The Applicant notes concerns with respect to the potential closure of the Suffolk Coast Path along the section of the cliff where the landfall location is identified. As outlined in section 4.9.3.2.3 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052), the onshore development area includes a section of the Suffolk Coast Path. The Applicant has committed that there will be no above ground interaction with this section of the PRoW along the edge of the cliff (section 2.1 of the Outline Public Rights of Way Strategy (APP-581)). This section of the onshore development area identified for trenchless techniques and therefore there will be no interruption to use of this recreational asset at the landfall location.</p> <p>Chapter 30 Tourism, Recreation and Socio-Economics (APP-078) recognises that there will be a significant localised and temporary effect on the views experienced by local residents, some motorists and some walkers on other short sections of the Suffolk Coast Path and Sandlings Walk where the route of these paths crosses the landfall location. However, the temporary diversion of paths and reinstatement of the land and landscape elements at the paths at the end of the construction period would make the effects temporary.</p>



2.25 Site Selection – Onshore Cable Route

Table 25 Applicant's Comments on Site Selection - Onshore Cable Route

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Principle drivers of onshore cable route siting	RR-019, RR-025, RR-043, RR-045, RR-050, RR-065, RR-068, RR-069, RR-070, RR-072, RR-074, RR-078, RR-088, RR-101, RR-116, RR-125, RR-132, RR-138, RR-205, RR-214, RR-215, RR-225, RR-230, RR-233, RR-236, RR-241, RR-242, RR-244, RR-245, RR-272, RR-281, RR-312, RR-315, RR-326, RR-335, RR-362, RR-365, RR-371, RR-378, RR-382, RR-385, RR-386, RR-387, RR-392, RR-393, RR-399, RR-409, RR-410, RR-411, RR-445, RR-447, RR-473, RR-483, RR-487, RR-488, RR-500, RR-523, RR-547, RR-560, RR-612, RR-616, RR-617, RR-620, RR-632, RR-647, RR-649, RR-665, RR-678, RR-684, RR-694, RR-696, RR-723, RR-736, RR-761, RR-764, RR-772, RR-774, RR-782, RR-790, RR-793, RR-797, RR-819, RR-827, RR-838, RR-849, RR-868, RR-882, RR-907.	<p>The Applicant notes queries raised in Relevant Representations regarding the drivers for the siting of the onshore cable route.</p> <p>The location of the onshore cable corridor (section 4.9.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)) is driven by the location of the onshore substations (section 4.9.1) and the location of the landfall (section 4.8). Key onshore cable route selection principles include:</p> <ul style="list-style-type: none"> • Avoid residential titles (including whole garden) where possible; • Avoid direct significant impacts to internationally and nationally designated areas (e.g. SACs, SPAs, and SSSIs etc.) where possible; • Minimise significant impacts to the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty; • Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction; • Minimise interaction with mature woodland; • Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting risk associated with interfering with another DCO proposal (statutory undertaker); • The onshore cable corridor / route (and therefore consideration of substation and landfall siting) should be kept as straight and as short as practicable;



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> Minimise the number and length of trenchless techniques such as horizontal direction drills (HDDs) (see Chapter 6 Project Description (APP-054); Minimise the number of crossings of assets (e.g. utilities) (assessed on a case-by-case basis); and All other policy and environmental constraints have been considered on a case-by-case basis (with consideration of appropriate mitigation). <p>Further detailed constraints mapping and engineering feasibility studies were then undertaken, which considered information from the public domain including AONB, SSSIs, SACs, SPAs, Scheduled Monuments and Grade I, II and II* Listed Buildings (including Historic Environment Records) boundaries and locations. Local environmental constraints were also identified including areas of mature woodland. Potential route corridors, based on environmental constraints were identified and further refined as described in section 4.9.2.2 of Chapter 4 Site Selection and Assessment of Alternatives.</p>
002	Consideration of brownfield sites and avoidance of greenbelt	RR-050, RR-065, RR-068, RR-070, RR-071, RR-088, RR-115, RR-125, RR-138, RR-151, RR-160, RR-187, RR-237, RR-264, RR-305, RR-312, RR-324, RR-327, RR-365, RR-371, RR-393, RR-409, RR-411, RR-413, RR-447, RR-457, RR-486, RR-513, RR-523, RR-530, RR-547, RR-557, RR-608, RR-632, RR-647, RR-659, RR-675, RR-681, RR-684, RR-782,	<p>The Applicant notes comments in Relevant Representation regarding the consideration given to brownfield sites and avoidance of the greenbelt.</p> <p>No areas of greenbelt are present within the onshore cable route (Table 21.4 of Chapter 21 Land Use (APP-069)). For clarity, the Applicant notes that brownfield land is defined as being land that has been previously developed¹⁹.</p>

¹⁹ Paragraph 177 of the National Planning Policy Framework (2019), available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-786, RR-787, RR-790, RR-797, RR-803, RR-806, RR-808, RR-827, RR-899.	<p>The route of the onshore cable corridor is driven by the location of the onshore substations (section 4.9.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)) and the location of the landfall (section 4.8).</p> <p>The onshore cable corridor routing followed the same framework of site selection principles as the onshore substation site selection process and therefore utilised the same area of search. As described in section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives, all other policy and environmental constraints have been considered on a case-by-case basis (with consideration of appropriate mitigation).</p> <p>Brownfield sites such as the Magnox (Sizewell A) land were considered (section 4.9.1.2.3) however Sizewell A decommissioning work will not be complete until 2125 (with Care & Maintenance due to commence by 2025). This area will not therefore be available when the Project would need to commence construction. The development of the onshore substation (and the associated onshore cable route) required for the Project could therefore not be developed on the Sizewell A land.</p>
003	Consideration of residential properties during onshore cable site selection	RR-042, RR-043, RR-050, RR-065, RR-068, RR-069, RR-088, RR-096, RR-098, RR-102, RR-105, RR-106, RR-112, RR-115, RR-116, RR-121, RR-122, RR-125, RR-132, RR-138, RR-143, RR-148, RR-166, RR-171, RR-184, RR-188, RR-195, RR-208, RR-223, RR-224, RR-225, RR-242, RR-244, RR-245, RR-269, RR-270, RR-272, RR-285, RR-293, RR-296, RR-298, RR-299, RR-305, RR-308, RR-309, RR-315, RR-321, RR-326, RR-327, RR-335, RR-338, RR-339, RR-350, RR-353, RR-354,	<p>The Applicant notes concerns raised within Relevant Representations regarding the consideration given to avoiding residential properties during the onshore site selection process.</p> <p>Avoiding residential titles and gardens (where possible) and minimising disruption to landowners, services, road users and residents generally; as well as prioritising voluntary (rather than compulsory powers of) acquisition were some of the key selection principles for the onshore cable route (section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)).</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-357, RR-358, RR-359, RR-361, RR-362, RR-365, RR-366, RR-368, RR-378, RR-382, RR-387, RR-395, RR-403, RR-410, RR-427, RR-437, RR-439, RR-440, RR-441, RR-445, RR-447, RR-454, RR-464, RR-467, RR-468, RR-472, RR-473, RR-474, RR-491, RR-492, RR-499, RR-500, RR-528, RR-531, RR-547, RR-552, RR-559, RR-566, RR-575, RR-576, RR-577, RR-599, RR-625, RR-626, RR-649, RR-652, RR-653, RR-666, RR-682, RR-685, RR-694, RR-696, RR-721, RR-722, RR-723, RR-728, RR-756, RR-764, RR-766, RR-796, RR-798, RR-801, RR-802, RR-803, RR-827, RR-830, RR-834, RR-848, RR-851, RR-852, RR-859, RR-864, RR-865, RR-866, RR-870, RR-873, RR-874, RR-876, RR-879, RR-880, RR-892, RR-902, RR-903, RR-907, RR-911, RR-912, RR-916, RR-918.	<p>The identified onshore cable corridor was refined in consultation with Local Planning Authorities and relevant statutory consultees. Section 4.9.2.2 sets out the refinements pertinent to residential properties, including:</p> <ul style="list-style-type: none"> The settlements of Thorpeness, Sizewell, Leiston, Coldfair Green, Knodishall and Friston, as well as isolated residential properties and titles were removed; Routeing across the woodland (and identified removal of trees) to the west of Aldeburgh Road as this is the only identified location where the cable route can cross Aldeburgh Road (section 4.9.1.3.4). The Applicant has committed to reducing the cable swathe to 16.1m for the Project only and 27.1m during parallel construction of both the Projects at this location, as well as retaining a minimum 5m buffer to residential properties to the south of Fitches Lane; <p>Non-statutory pre-application consultation has been undertaken with landowners and/or their land agents since September 2017 (for details see Consultation Report (APP-029)). Comments and suggestions put forward by landowners are described in section 4.9.3.1, and these have helped to refine the Project design..</p>
004	Consideration of ecology and ancient woodland	RR-042, RR-045, RR-050, RR-068, RR-069, RR-070, RR-071, RR-072, RR-088, RR-096, RR-098, RR-102, RR-105, RR-106, RR-112, RR-115, RR-116, RR-121, RR-122, RR-125, RR-132, RR-133, RR-138, RR-139, RR-140, RR-143, RR-148, RR-160, RR-163, RR-166, RR-171, RR-172, RR-173, RR-178, RR-184, RR-188, RR-195, RR-205, RR-208, RR-214, RR-215, RR-223, RR-224, RR-225, RR-230, RR-232, RR-236, RR-242, RR-244, RR-245,	<p>The Applicant notes concerns raised in Relevant Representations regarding the consideration given to ecology and ancient woodland during the onshore cable route site selection process.</p> <p>As described in section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052), one of the site selection principles for the initial onshore cable route was to avoid direct significant impacts to internationally and nationally designated areas (e.g. SACs, SPAs, and SSSIs etc) where possible. Key environmental constraints (SSSIs, SACs, SPAs and mature woodland)</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-249, RR-262, RR-263, RR-270, RR-272, RR-278, RR-279, RR-277, RR-281, RR-293, RR-296, RR-298, RR-299, RR-300, RR-305, RR-308, RR-309, RR-312, RR-315, RR-319, RR-326, RR-330, RR-331, RR-333, RR-335, RR-336, RR-338, RR-339, RR-341, RR-343, RR-350, RR-353, RR-354, RR-357, RR-358, RR-359, RR-360, RR-361, RR-366, RR-368, RR-369, RR-371, RR-375, RR-378, RR-386, RR-387, RR-393, RR-395, RR-396, RR-400, RR-403, RR-405, RR-409, RR-410, RR-421, RR-427, RR-432, RR-437, RR-439, RR-440, RR-441, RR-445, RR-447, RR-454, RR-456, RR-457, RR-467, RR-468, RR-471, RR-473, RR-474, RR-483, RR-490, RR-491, RR-492, RR-496, RR-499, RR-500, RR-504, RR-510, RR-513, RR-517, RR-523, RR-524, RR-528, RR-529, RR-530, RR-531, RR-532, RR-546, RR-547, RR-552, RR-555, RR-557, RR-559, RR-563, RR-564, RR-570, RR-575, RR-576, RR-577, RR-584, RR-587, RR-589, RR-593, RR-599, RR-604, RR-605, RR-610, RR-611, RR-612, RR-616, RR-617, RR-619, RR-625, RR-626, RR-628, RR-633, RR-643, RR-645, RR-647, RR-649, RR-650, RR-651, RR-653, RR-655, RR-657, RR-659, RR-666, RR-668, RR-669, RR-673, RR-675, RR-682, RR-684, RR-685, RR-694, RR-696, RR-702, RR-703, RR-708, RR-710, RR-715, RR-718, RR-721, RR-723, RR-728, RR-736, RR-741, RR-743, RR-747, RR-749, RR-753, RR-755, RR-756, RR-763, RR-764, RR-766, RR-768,	<p>sourced from the public domain were used to refine potential options for the onshore cable corridor.</p> <p>The identified onshore cable corridor was refined in consultation with Local Planning Authorities and relevant statutory consultees. Section 4.9.2.2 sets out the refinements pertinent to onshore ecology:</p> <ul style="list-style-type: none"> • Areas of Ancient Woodland were removed from the search area to avoid potential impacts; the principles of site selection has ensured that ancient woodland will not be disturbed; • The narrowest section of the 'Leiston – Aldeburgh SSSI' and the 'Sandlings SPA' was identified for the potential crossing location to reduce potential impacts on these designated sites. This has resulted in the onshore cable corridor routeing north from the landfall location to minimise interaction with key international and national environmental designations; • The site of the 'Leiston - Aldeburgh SSSI' and the 'Sandlings SPA' crossing was widened to increase routeing flexibility in this area (the Applicant has discussed the option of trenchless techniques at this location to reduce potential direct impacts on the SSSI and SPA with statutory and non-statutory consultees); • Routeing across the woodland (and identified removal of trees) to the west of Aldeburgh Road as this is the only identified location where the cable route can cross Aldeburgh Road (section 4.9.1.3.4). The Applicant has committed to reducing the cable swathe to 16.1m for the Project only and 27.1m during parallel construction of both the Projects at this location, as well as retaining a minimum 5m buffer of woodland at this location to retain as many trees as possible at this location.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-772, RR-774, RR-775, RR-777, RR-778, RR-786, RR-787, RR-789, RR-790, RR-791, RR-797, RR-798, RR-801, RR-802, RR-803, RR-812, RR-816, RR-818, RR-819, RR-827, RR-833, RR-834, RR-837, RR-838, RR-843, RR-845, RR-848, RR-849, RR-850, RR-851, RR-852, RR-854, RR-859, RR-862, RR-863, RR-864, RR-865, RR-866, RR-868, RR-869, RR-870, RR-873, RR-874, RR-876, RR-879, RR-880, RR-882, RR-887, RR-892, RR-902, RR-903, RR-907, RR-916.	Further details relating to the refinement of the Project design which are pertinent to onshore ecology are described in section 4.9.3.2 and covers the Sandlings SPA, County Wildlife Sites, Suffolk Coastal Path, Hedgerows and Aldeburgh Road Woodland.
005	Requirements for cables underground on land and not in the marine environment.	RR-020, RR-025, RR-068, RR-070, RR-071, RR-088, RR-121, RR-122, RR-125, RR-132, RR-133, RR-168, RR-204, RR-225, RR-237, RR-281, RR-294, RR-312, RR-324, RR-356, RR-371, RR-399, RR-409, RR-411, RR-428, RR-513, RR-547, RR-616, RR-625, RR-649, RR-678, RR-684, RR-499, RR-529, RR-657, RR-659, RR-675, RR-681, RR-721, RR-723, RR-778, RR-790, RR-797, RR-827, RR-853, RR-854, RR-862.	Please see the Applicant's response regarding the Offshore Ring Main (Table 17).
006	Alternatives onshore cable routes considered outside of the AONB	RR-019, RR-025, RR-050, RR-069, RR-070, RR-072, RR-088, RR-116, RR-138, RR-184, RR-187, RR-188, RR-193, RR-194, RR-204, RR-208, RR-225, RR-230, RR-232, RR-249, RR-259, RR-263, RR-270, RR-274, RR-278, RR-279, RR-300, RR-305, RR-308, RR-312, RR-319, RR-336, RR-341, RR-356, RR-357, RR-358, RR-359, RR-371, RR-372, RR-393, RR-400, RR-402, RR-424, RR-427, RR-432,	<p>The Applicant notes queries within Relevant Representations regarding alternative cable routes considered outside the AONB.</p> <p>The route of the onshore cable corridor is driven by the location of the onshore substations (section 4.9.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)) and the location of the landfall (section 4.8). For the Applicant's responses regarding site selection and consideration of alternatives</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-440, RR-457, RR-471, RR-474, RR-484, RR-490, RR-504, RR-510, RR-524, RR-531, RR-546, RR-555, RR-559, RR-560, RR-564, RR-575, RR-576, RR-589, RR-593, RR-605, RR-610, RR-633, RR-645, RR-655, RR-668, RR-677, RR-708, RR-710, RR-715, RR-721, RR-722, RR-749, RR-757, RR-763, RR-776, RR-789, RR-803, RR-835, RR-868, RR-874, RR-876, RR-879, RR-880, RR-892, RR-902, RR-911, RR-912.	<p>for the onshore substations and landfall, please see Table 26 and Table 24 respectively.</p> <p>As the landfall is located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), the cable routeing connecting to the onshore substation and National Grid infrastructure must be routed through the zones (Zone A – C) of the AONB as described in section 29.6.1.2.1 of Chapter 29 Landscape and Visual Impact Assessment (APP-077) and as shown in Figure 29.8 (APP-398). As previously described in response to the drivers of site selection, one of the key site selection principles for the onshore cable route (section 4.9.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)) is to minimise significant impacts to the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Therefore the most appropriate route has been identified.</p>
007	Consideration of recreation and tourism	RR-019, RR-025, RR-043, RR-050, RR-065, RR-068, RR-069, RR-070, RR-071, RR-072, RR-074, RR-093, RR-098, RR-099, RR-102, RR-106, RR-116, RR-121, RR-122, RR-125, RR-132, RR-135, RR-139, RR-143, RR-148, RR-160, RR-166, RR-168, RR-171, RR-173, RR-174, RR-178, RR-189, RR-193, RR-194, RR-195, RR-197, RR-202, RR-204, RR-205, RR-208, RR-214, RR-215, RR-223, RR-224, RR-225, RR-230, RR-232, RR-234, RR-236, RR-240, RR-242, RR-245, RR-249, RR-259, RR-262, RR-269, RR-272, RR-277, RR-278, RR-279, RR-298, RR-299, RR-300, RR-308, RR-309, RR-312, RR-315, RR-326, RR-327,	<p>The Applicant notes concerns raised in Relevant Representations regarding the consideration given to recreation and tourism as part of the onshore cable route site selection process.</p> <p>As described in section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052), the key site selection principles relating to recreation include:</p> <ul style="list-style-type: none"> • Avoiding proximity to residential dwellings; • Avoiding proximity to historic buildings; • Avoiding siting permanent operational onshore infrastructure (the onshore substation and National Grid infrastructure) within the AONB and other designated sites (such as common land); and



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-330, RR-331, RR-335, RR-342, RR-343, RR-350, RR-354, RR-356, RR-362, RR-365, RR-366, RR-368, RR-369, RR-371, RR-375, RR-378, RR-382, RR-386, RR-395, RR-396, RR-403, RR-409, RR-410, RR-411, RR-413, RR-421, RR-432, RR-437, RR-439, RR-441, RR-445, RR-447, RR-454, RR-456, RR-464, RR-467, RR-468, RR-470, RR-471, RR-473, RR-474, RR-483, RR-487, RR-490, RR-500, RR-510, RR-524, RR-528, RR-531, RR-545, RR-552, RR-557, RR-559, RR-560, RR-566, RR-570, RR-575, RR-576, RR-577, RR-584, RR-587, RR-588, RR-599, RR-604, RR-605, RR-608, RR-610, RR-611, RR-612, RR-617, RR-619, RR-625, RR-628, RR-632, RR-633, RR-640, RR-643, RR-649, RR-650, RR-651, RR-652, RR-653, RR-659, RR-666, RR-669, RR-675, RR-682, RR-684, RR-685, RR-694, RR-700, RR-703, RR-718, RR-741, RR-742, RR-743, RR-747, RR-749, RR-753, RR-755, RR-756, RR-757, RR-761, RR-763, RR-764, RR-766, RR-772, RR-774, RR-775, RR-776, RR-777, RR-778, RR-781, RR-783, RR-786, RR-787, RR-790, RR-798, RR-801, RR-802, RR-810, RR-816, RR-818, RR-819, RR-827, RR-836, RR-837, RR-843, RR-850, RR-851, RR-859, RR-863, RR-864, RR-865, RR-866, RR-868, RR-869, RR-873, RR-887, RR-892,	<ul style="list-style-type: none"> Minimising impacts to local residents in relation to access to services and road usage, including footpath closures; <p>Following the Preliminary Environmental Information Report (PEIR) consultation, a review of consultation feedback was undertaken to refine on the onshore development area which included ecological designations and recreational assets (section 4.9.3 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052). The Outline Public Rights of Way Strategy (APP-581) outlines the management principles to be adopted in ensuring that PRow are managed in a safe and appropriate manner during construction and operation. Precise details for the management of each PRow, including the specification of any PRow temporary diversions, during construction works will be agreed with the Local Planning Authority (following consultation with the Local Highway Authority) through approval of the final PRow Strategy, prior to commencement of any stage of the authorised development that would affect a PRow specified in Schedule 3 or 4 of the draft DCO (APP-023).</p> <p>For PRow which will be permanently stopped up, as set out in Article 10 of the draft DCO, the existing PRow cannot be extinguished until the Local Highway Authority confirms that the alternative PRow has been created to the standard defined in the final PRow Strategy.</p> <p>For temporary stopping up of PRow, Article 11 of the draft DCO requires the alternative right of way to be in place to the reasonable satisfaction of the Local Highway Authority before the existing PRow can be temporarily stopped up.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-899, RR-903, RR-911, RR-912, RR-916, RR-917, RR-918, RR-919.	
008	Consideration of landscape	RR-019, RR-025, RR-043, RR-065, RR-068, RR-069, RR-070, RR-071, RR-072, RR-074, RR-078, RR-088, RR-093, RR-098, RR-099, RR-102, RR-106, RR-116, RR-121, RR-122, RR-125, RR-132, RR-138, RR-143, RR-148, RR-149, RR-151, RR-160, RR-163, RR-166, RR-171, RR-172, RR-173, RR-184, RR-189, RR-193, RR-194, RR-195, RR-197, RR-202, RR-205, RR-214, RR-223, RR-224, RR-225, RR-232, RR-233, RR-234, RR-236, RR-240, RR-242, RR-244, RR-245, RR-264, RR-269, RR-272, RR-277, RR-281, RR-293, RR-296, RR-298, RR-299, RR-305, RR-309, RR-312, RR-315, RR-321, RR-326, RR-327, RR-335, RR-338, RR-339, RR-354, RR-362, RR-365, RR-366, RR-368, RR-371, RR-375, RR-378, RR-382, RR-385, RR-386, RR-387, RR-393, RR-395, RR-396, RR-403, RR-405, RR-409, RR-410, RR-411, RR-424, RR-432, RR-437, RR-439, RR-441, RR-445, RR-447, RR-454, RR-467, RR-471, RR-473, RR-483, RR-484, RR-487, RR-491, RR-492, RR-496, RR-500, RR-514, RR-517, RR-528, RR-547, RR-552, RR-560, RR-577, RR-584, RR-599, RR-604, RR-611, RR-612, RR-616, RR-617, RR-619, RR-625, RR-632, RR-640, RR-647, RR-649,	<p>The Applicant notes comments within Relevant Representations regarding the consideration of landscape as part of the onshore cable route site selection.</p> <p>The selection of the onshore cable route has followed a number of key design principles (Table 29.3 of Chapter 29 Landscape and Visual Impact Assessment (LVIA) (APP-077)), where practical, the following being relevant to LVIA:</p> <ul style="list-style-type: none"> • Wherever possible to locate the onshore cable route through open agricultural land; • To avoid landscape designations including Registered Parks and Gardens (RPGs); • To avoid areas of woodland and trees as far as possible; • To minimise the number of hedgerow crossings and utilise existing gaps in field boundaries if possible; and • To avoid proximity to residential dwellings and settlements. <p>Landscape and visual mitigation is embedded in the selection of a route which minimises effects on natural heritage designations (SSSI/SPA/SAC/Ramsar/NNR), minimises the effects on the AONB and physical effects on hedgerows and trees.</p> <p>The onshore development area has been refined so that woodland is retained acting as screening between residential properties on Fitches Lane and the onshore cable route and also between the onshore cable route and Aldringham</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-650, RR-651, RR-652, RR-653, RR-668, RR-669, RR-678, RR-681, RR-682, RR-684, RR-685, RR-694, RR-696, RR-700, RR-702, RR-703, RR-718, RR-723, RR-728, RR-736, RR-741, RR-743, RR-747, RR-753, RR-755, RR-756, RR-761, RR-764, RR-772, RR-774, RR-778, RR-782, RR-783, RR-789, RR-790, RR-793, RR-797, RR-798, RR-801, RR-802, RR-803, RR-810, RR-812, RR-816, RR-819, RR-827, RR-834, RR-837, RR-845, RR-851, RR-852, RR-859, RR-862, RR-863, RR-864, RR-865, RR-866, RR-868, RR-869, RR-887, RR-907, RR-916, RR-918.	Court Nursing Home (section 4.9.1.3.4 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)).
009	Consideration of traffic	RR-019, RR-020, RR-025, RR-042, RR-043, RR-050, RR-068, RR-069, RR-070, RR-072, RR-074, RR-088, RR-096, RR-099, RR-098, RR-099, RR-102, RR-106, RR-116, RR-121, RR-125, RR-128, RR-132, RR-139, RR-147, RR-148, RR-149, RR-151, RR-163, RR-166, RR-173, RR-174, RR-189, RR-190, RR-195, RR-197, RR-223, RR-224, RR-233, RR-236, RR-240, RR-242, RR-245, RR-269, RR-272, RR-277, RR-285, RR-296, RR-298, RR-299, RR-305, RR-309, RR-315, RR-326, RR-327, RR-335, RR-338, RR-339, RR-354, RR-362, RR-365, RR-366, RR-368, RR-371, RR-375, RR-378, RR-382, RR-385, RR-386, RR-387, RR-395, RR-396, RR-403, RR-410, RR-413,	<p>The Applicant notes concerns raised within Relevant Representations regarding the consideration of traffic during as part of the onshore cable route site selection.</p> <p>As described in section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052), one of the site selection principles is to minimise disruption to road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction.</p> <p>For the onshore cable route, additional project refinements (section 4.9.3.7) include:</p> <ul style="list-style-type: none"> Reduction of Saturday working hours from 7am to 7pm, reduced to 7am to 1pm (secured under Requirement 23 and Requirement 24 of the draft Development Consent Order (APP-023) (DCO);



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-432, RR-437, RR-439, RR-441, RR-445, RR-447, RR-454, RR-467, RR-471, RR-473, RR-487, RR-499, RR-500, RR-513, RR-528, RR-547, RR-552, RR-560, RR-577, RR-599, RR-604, RR-611, RR-612, RR-617, RR-625, RR-632, RR-647, RR-649, RR-650, RR-651, RR-652, RR-653, RR-669, RR-682, RR-684, RR-685, RR-696, RR-723, RR-728, RR-736, RR-741, RR-743, RR-747, RR-756, RR-761, RR-764, RR-768, RR-772, RR-774, RR-778, RR-781, RR-782, RR-790, RR-798, RR-801, RR-802, RR-816, RR-819, RR-827, RR-836, RR-837, RR-850, RR-851, RR-852, RR-859, RR-863, RR-864, RR-865, RR-866, RR-868, RR-869, RR-887, RR-907, RR-916, RR-917, RR-918, RR-919.	<ul style="list-style-type: none"> Removal of landfall access via the B1353 (Thorpeness Road) reducing the HGV traffic demand at the Aldeburgh Road roundabout and along Aldeburgh Road; as well as removal of the convoy system and marshalling area on Thorpeness Road; and The reduction in footprint of all onshore cable route construction consolidation sites (CCS), and removal of a CCS immediately east of Snape Road thereby reducing the number of construction vehicle movements. No stage of the onshore works may commence until for that stage a construction traffic management plan (CTMP) (in accordance with the Outline CTMP (APP-586) and travel plan (in accordance with the Outline Travel Plan (APP-588) has been submitted to and approved by the relevant planning authority in consultation with the relevant highway authority. This is secured under Requirement 28 of the draft DCO (APP-023).
010	Consideration of land use	RR-043, RR-050, RR-065, RR-069, RR-070, RR-072, RR-074, RR-088, RR-098, RR-099, RR-102, RR-106, RR-121, RR-122, RR-125, RR-132, RR-138, RR-139, RR-143, RR-148, RR-149, RR-163, RR-166, RR-172, RR-173, RR-178, RR-184, RR-189, RR-193, RR-194, RR-195, RR-197, RR-205, RR-215, RR-223, RR-224, RR-225, RR-233, RR-234, RR-236, RR-242, RR-244, RR-245, RR-269, RR-272, RR-277, RR-278, RR-279, RR-281, RR-285, RR-296, RR-298, RR-299, RR-305, RR-309, RR-312, RR-315, RR-321, RR-326, RR-327,	<p>The Applicant notes comments within Relevant Representations regarding the consideration of land use as part of the onshore cable route site selection.</p> <p>As described in section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052), the key site selection principles relating to land use include:</p> <ul style="list-style-type: none"> Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction; Minimise interaction with mature woodland; and



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-335, RR-338, RR-339, RR-341, RR-345, RR-350, RR-354, RR-362, RR-365, RR-366, RR-368, RR-371, RR-375, RR-378, RR-382, RR-385, RR-386, RR-387, RR-393, RR-395, RR-396, RR-403, RR-409, RR-410, RR-424, RR-432, RR-437, RR-439, RR-441, RR-445, RR-447, RR-454, RR-467, RR-471, RR-473, RR-483, RR-487, RR-490, RR-491, RR-492, RR-496, RR-500, RR-510, RR-513, RR-517, RR-528, RR-547, RR-552, RR-560, RR-577, RR-584, RR-588, RR-589, RR-599, RR-604, RR-611, RR-612, RR-616, RR-617, RR-625, RR-632, RR-647, RR-649, RR-650, RR-651, RR-652, RR-653, RR-668, RR-669, RR-673, RR-677, RR-678, RR-682, RR-684, RR-685, RR-694, RR-696, RR-702, RR-703, RR-710, RR-715, RR-723, RR-728, RR-736, RR-741, RR-743, RR-747, RR-753, RR-755, RR-756, RR-757, RR-763, RR-764, RR-768, RR-772, RR-778, RR-781, RR-782, RR-783, RR-790, RR-791, RR-797, RR-798, RR-801, RR-802, RR-806, RR-816, RR-819, RR-827, RR-837, RR-851, RR-852, RR-859, RR-863, RR-864, RR-865, RR-866, RR-868, RR-869, RR-887, RR-907, RR-916, RR-918.	<ul style="list-style-type: none"> Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting risk associated with interfering with another DCO proposal (statutory undertaker); <p>Refinements to the onshore cable route and location of associated infrastructure have taken place throughout the design and refinement process, taking into consideration the locations of sensitive land uses, such as urban land, residential land and major utilities. The Applicant has committed to a narrowed onshore cable route swathe of 16.1m (reduced from 32m) to avoid sensitive land features (section 6.7.3.1.1 of Chapter 6 Project Description (APP-054), namely:</p> <ul style="list-style-type: none"> The Sandlings Special Protection Area (SPA) designated site; Where the cables cross the woodland to the west of Aldeburgh Road; and Where the cables cross an important hedgerow specified in Part 2 of Schedule 11 of the draft DCO (APP-023) <p>Land take has been reduced as far as practicable. Reinstatement of land to its original use will be undertaken as far as practical following the completion of the construction works. The onshore development area has been refined to ensure there is no interaction with common land (above or below ground). Onshore development area refinements have ensured that there is no interaction with Thorpeness Common as a response to Section 42 consultation (Table 21.3 of Chapter 21 Land Use (APP-069).</p>



2.26 Site Selection – Onshore Substations

Table 26 Applicant's Comments on Site Selection - Onshore Substations

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Process for substation site selection and consideration of alternative substation locations	RR-020, RR-43, RR-044, RR-045, RR-049, RR-050, RR-065, RR-068, RR-069, RR-071, RR-072, RR-078, RR-080, RR-088, RR-089, RR-093, RR-098, RR-099, RR-101, RR-102, RR-104, RR-106, RR-113, RR-116, RR-122, RR-125, RR-129, RR-130, RR-132, RR-133, RR-134, RR-136, RR-138, RR-139, RR-142, RR-143, RR-144, RR-147, RR-149, RR-150, RR-155, RR-158, RR-166, RR-167, RR-170, RR-171, RR-173, RR-174, RR-183, RR-187, RR-189, RR-190, RR-194, RR-195, RR-196, RR-197, RR-201, RR-204, RR-205, RR-205, RR-207, RR-215, RR-219, RR-223, RR-225, RR-232, RR-233, RR-234, RR-235, RR-238, RR-242, RR-245, RR-253, RR-264, RR-271, RR-274, RR-276, RR-277, RR-278, RR-279, RR-281, RR-284, RR-289, RR-290, RR-294, RR-296, RR-298, RR-299, RR-300, RR-302, RR-305, RR-307, RR-309, RR-312, RR-314, RR-315, RR-317, RR-319, RR-321, RR-322,	<p>The Applicant notes queries raised within Relevant Representations regarding the site selection process for the onshore substation.</p> <p>For clarity, there are two co-located onshore substation locations for the Projects. It should be noted that the draft DCOs for the Projects have the flexibility for either project to use either onshore substation location (section 3.1 of the Development Consent and Planning Statement (APP-579).</p> <p>National Grid provided a grid connection for both Projects in the vicinity of Sizewell and Leiston. Section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Connection and Infrastructure Options Note (CION) process and the work undertaken by the Applicant with National Grid to establish a grid connection location. The CION process considers the total life cost of the connection assessing both the capital and projected operational costs to the onshore network (over a project's lifetime) to determine the most economic and efficient design option. Table 4.3 provides a summary of the optioneering within this process.</p> <p>The Applicant has followed NPS EN-1, NPS EN-3, NPS EN-5 the Electricity Act 1989 and National Grid's Guidelines on Substation Siting and Design (Horlock Rules) with the following aims:</p> <ul style="list-style-type: none"> Onshore substation to be positioned as close to the existing National Grid overhead lines as possible to reduce the requirement for cabling; and Onshore substation and National Grid substation to be positioned to deliver an efficient and economic system.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-323, RR-324, RR-325, RR-326, RR-327, RR-330, RR-332, RR-333, RR-335, RR-338, RR-339, RR-341, RR-342, RR-345, RR-351, RR-352, RR-353, RR-354, RR-356, RR-357, RR-358, RR-359, RR-361, RR-363, RR-364, RR-365, RR-366, RR-369, RR-368, RR-370, RR-371, RR-372, RR-375, RR-378, RR-379, RR-382, RR-383, RR-385, RR-386, RR-388, RR-389, RR-392, RR-393, RR-396, RR-399, RR-402, RR-409, RR-420, RR-423, RR-424, RR-426, RR-427, RR-429, RR-430, RR-440, RR-445, RR-446, RR-448, RR-449, RR-452, RR-466, RR-468, RR-470, RR-472, RR-473, RR-474, RR-478, RR-479, RR-487, RR-498, RR-499, RR-504, RR-511, RR-513, RR-514, RR-516, RR-517, RR-518, RR-523, RR-524, RR-529, RR-530, RR-536, RR-540, RR-541, RR-542, RR-546, RR-547, RR-558, RR-559, RR-563, RR-564, RR-566, RR-576, RR-587, RR-589, RR-595, RR-597, RR-598, RR-604, RR-605, RR-606, RR-610, RR-617, RR-619, RR-621, RR-626, RR-628, RR-631, RR-632, RR-635, RR-651, RR-655, RR-657, RR-659, RR-663,	<p>Paragraph 2.6.34 of EN-3 makes it clear that Applicant must work within the regulatory regime for offshore transmission networks established by Ofgem. The Applicant has done this and has gone through the appropriate processes for the siting of the grid connection in line with the regulatory framework.</p> <p>The initial onshore study area encompassed an area within a 1km buffer of the overhead line route into Sizewell. This was to ensure that any potential options, at a less economic and efficient distance from the overhead line, would still be captured and considered. Section 4.9.1.2.4 describes the subsequent review and refinement of this initial study area.</p> <p>Within the onshore study area, seven zones were identified as potential substation sites, based on available space to accommodate the required project (section 4.9.1.3). Additionally, a 'target' buffer of 250m from residential properties was applied as a proxy for minimising disturbance to residents.</p> <p>The seven potential substation zones were scored using a Red / Amber / Green (RAG) assessment (Appendix 4.2 (APP-443)) against criteria agreed with statutory consultees. These included archaeology / heritage, ecology, landscape, hydrology and hydrogeology, engineering, community, landscape and visual, property and planning. The RAG assessment did not identify the chosen onshore substation site, rather it was a tool that allowed a number of sites to be compared and the most acceptable sites identified at the time to progress to further assessment stages.</p> <p>The culmination of the various work streams as described in section 4.9.1.3 enabled the Applicants to decide that the substation zone northeast of Friston (Zone 7) as the proposed zone to be taken forward.</p> <p>Phase 3.5 Consultation (section 4.9.1.6 of Chapter 4 Site Selection and Assessment of Alternatives) enabled the Applicant to engage with local communities and consultees on the opportunity to consider an alternative substation</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-665, RR-674, RR-675, RR-677, RR-678, RR-681, RR-682, RR-684, RR-688, RR-696, RR-697, RR-698, RR-699, RR-700, RR-701, RR-703, RR-706, RR-709, RR-710, RR-718, RR-724, RR-731, RR-736, RR-742, RR-746, RR-747, RR-749, RR-754, RR-756, RR-767, RR-768, RR-777, RR-778, RR-780, RR-781, RR-786, RR-787, RR-789, RR-790, RR-795, RR-796, RR-797, RR-802, RR-803, RR-806, RR-808, RR-816, RR-821, RR-825, RR-827, RR-832, RR-834, RR-848, RR-853, RR-854, RR-860, RR-862, RR-863, RR-864, RR-865, RR-870, RR-873, RR-874, RR-876, RR-879, RR-880, RR-885, RR-883, RR-899, RR-892, RR-893, RR-902, RR-904, RR-908, RR-911, RR-912, RR-913, RR-917, RR-919	<p>site at Broom Covert, Sizewell (Zone 8) in parallel with proposals for a substation site at Grove Wood, Friston (Zone 7).</p> <p>As set out in section 4.9.1.6., there are significant differences between the proposed onshore substations sites Grove Wood, Friston and Broom Covert, Sizewell:</p> <ul style="list-style-type: none"> • Presence of Broom Covert, Sizewell within the Suffolk Coast and Heaths AONB, contrary to NPS EN-1 and NPPF policy, presenting a significant consenting risk to the project. A suitable alternative outside the Suffolk Coast and Heaths AONB exists (Grove Wood, Friston) and therefore exceptional circumstances do not exist to site within the AONB. • The Broom Covert, Sizewell site is located within the AONB (which is contrary to the NPS EN-1 policy) and siting in the Broom Covert, Sizewell site is likely to result in significant effects on some of the special qualities of the AONB; • Significant risk of Compulsory Acquisition Powers not being available to SPR at the Broom Covert, Sizewell site (due to the proximity to Sizewell B Nuclear Power Station and Galloper Offshore Wind Farm statutory undertaker land and the use of the site as reptile mitigation land for the proposed Sizewell C New Nuclear Power Station development • The need to secure replacement reptile mitigation land for the Sizewell C New Nuclear Power Station development on a voluntary basis, without the ability to secure land by compulsory acquisition (as land would need to be secured prior to SPR's compulsory acquisition rights being made available to allow its use by EDF); and • Additional costs incurred in laying an additional 6km cable length to Grove Wood, Friston.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			The Broom Covert, Sizewell site presented significant policy challenges toward gaining consent which outweighed the increased cost of further cabling to the Grove Wood, Friston site. It is the Applicant's position, in accordance with policies set out in NPS EN-1 and based on extensive advice and stakeholder engagement that the Grove Wood, Friston site offers the most appropriate option for the siting of onshore substations and National Grid infrastructure (section 4.9.1.7). .
002	Applicant's approach to Suffolk Coast and Heaths AONB protections during site selection	RR-050, RR-088, RR-096, RR-133, RR-137, RR-142, RR-144, RR-150, RR-155, RR-158, RR-168, RR-173, RR-188, RR-193, RR-196, RR-199, RR-222, RR-230, RR-234, RR-244, RR-249, RR-252, RR-301, RR-308, RR-310, RR-313, RR-323, RR-356, RR-366, RR-369, RR-370, RR-400, RR-416, RR-423, RR-428, RR-445, RR-493, RR-498, RR-518, RR-524, RR-535, RR-567, RR-625, RR-631, RR-649, RR-655, RR-668, RR-674, RR-698, RR-748, RR-764, RR-786, RR-788, RR-803, RR-835, RR-839, RR-853, RR-854, RR-868, RR-917	<p>The Applicant notes queries raised within Relevant Representations regarding the Suffolk Coast and Heaths AONB protections during site selection.</p> <p>For clarity, the onshore substation and National Grid infrastructure is not located within the Suffolk Coast and Heaths AONB.</p> <p>The Applicant has undertaken an impact appraisal for the onshore substations on the Suffolk Coast and Heaths AONB as part of the site selection process (section 4.9.1.3.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052). The Suffolk Coast and Heaths AONB impact appraisal (Appendix 4.3 (APP-444)) used the 'natural beauty' indicators (LDA Design 2016)²⁰ as indicators for landscape qualities of the AONB. Each substation zone was assessed against each 'natural beauty' indicator assessing the magnitude of change to the special quality and potential effect on the AONB special qualities. The appraisal concluded that if the substations were to be sited in or immediately adjacent to the AONB then there were likely to be significant effects on the special qualities of the AONB, and if sited within the western substation zones, there were likely to be no significant effects on the special qualities of the AONB. The Applicant has also conducted a policy assessment of NPS EN-1 relating to AONBs (section 4.9.1.3.3). In summary, all policy (NPS EN-1 and the National Planning Policy Framework (NPPF)) states that</p>

²⁰ LDA Design (2016) Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators. V1.5. Version date; 21 November 2016.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>development in the AONB should proceed only in exceptional circumstances. The proposed onshore substation and National Grid infrastructure are therefore sited outside of the the Suffolk Coast and Heaths AONB.</p> <p>A Red / Amber / Green (RAG) methodology has been used to inform site selection. This is considered appropriate to compare a number of sites for similar infrastructure, given the ability to capture and classify the main differentiating issues in three fundamental categories. A RAG assessment of this type enables a clear and direct comparison between each site. RAG is a standard assessment tool used in the pre-EIA process to assess the potential risks to proposed development options.</p> <p>The Onshore Substation Site Selection RAG Assessment Appendix 4.2 (APP-443) was updated following the AONB impact appraisal (creating an addendum, and subsequent second version, of the Onshore Substation Site Selection RAG Assessment). It was communicated to stakeholders at the February 2018 site visit and workshop that locating substations within any of the eastern substation zones would be likely to result in significant, including adverse, effects on a number of the special qualities of the AONB. As a feasible site was identified outside the AONB then the Applicant determined that the exceptional circumstances test could not be met.</p> <p>The Applicant is required to take a balanced view toward site selection and the decision is based on a range of factors including deliverability, legal requirements, planning policy, technical engineering constraints, technical assessments (such as planning policy, landscape and visual impacts and ecology) and with the benefit of knowledge gained on SPR's previous projects. This also includes the CION process and the work undertaken with National Grid to establish a grid connection location (section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)). The CION process considers the total life cost of the connection assessing both the capital and projected operational costs to the onshore network (over a</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>project's lifetime) to determine the most economic and efficient design option. This is a principle driver for the location of landfall and substations and the subsequent onshore cable corridor route. Table 4.3 provides a summary of the optioneering within this process.</p> <p>The Applicant has followed NPS EN-1, NPS EN-3, NPS EN-5 the Electricity Act 1989 and National Grid's Guidelines on Substation Siting and Design (Horlock Rules) with the following aims:</p> <ul style="list-style-type: none"> Onshore substation to be positioned as close to the existing National Grid overhead lines as possible to reduce the requirement for cabling; and Onshore substation and National Grid substation to be positioned as close as possible to each other to deliver an efficient and economic system (co-location). <p>Paragraph 2.6.34 of EN-3 makes it clear that Applicant must work within the regulatory regime for offshore transmission networks established by Ofgem. The Applicant has done this and has gone through the appropriate processes for the siting of the grid connection in line with the regulatory framework.</p> <p>The culmination of the various work streams, as described <i>in section 4.9.1.3 of Chapter 4 Site Selection and Assessment of Alternatives</i>, enabled the Applicant to determine that the substation zone northeast of Friston (Zone 7) was the selected zone to be taken forward for consultation via Public Information Days in February and March 2019.</p>
003	Change from Bramford as the principle location for grid connection	RR-025, RR-043, RR-045, RR-074, RR-101, RR-117, RR-184, RR-225, RR-231, RR-322, RR-356, RR-383, RR-393, RR-420, RR-473, RR-793	<p>The Applicant must work within the current regulatory framework in order to deliver the Project. The National Policy Statement (EN-3) for Renewable Energy Infrastructure states at paragraph 2.6.34 that: "Applicants for consent for offshore wind farms will have to work within the regulatory regime for offshore transmission networks established by Ofgem. Under the regime offshore transmission will be a</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>licensed activity regulated by Ofgem.” National Grid owns the England and Wales electricity transmission network. Part of the assessment in determining grid connection location is the CION Process, which National Grid is under a statutory duty to undertake. The CION process is the mechanism used by National Grid to evaluate the potential options for connecting to the transmission system.</p> <p>Section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) provides an overview of the CION process in respect of the grid connection location. In 2010, Bramford was the most economic and efficient connection point for the East Anglia ONE, East Anglia TWO and East Anglia THREE projects at that time. In 2016 SPR identified the redefined East Anglia TWO and East Anglia ONE North projects as the next projects to be brought forward for development consent.</p> <p>SPR engaged with National Grid in early 2017 to determine connection options for the Projects based on contracted background at that time and reflecting the projects’ timescales and reduced capacities. National Grid advised that due to the changing contracted background, connection capacity could be available in the Sizewell / Leiston area. The CION process was subsequently triggered and concluded that the most economic and efficient connections for the Projects, while considering environmental and programme implications, would be into the circuits in or around Leiston.</p>
004	Compulsory acquisition powers for land associated with Sizewell C	RR-506,	<p>Section 4.9.1.2.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the Applicant’s early engagement with EDF Energy regarding land at Sizewell C. This commenced in May 2017 and included discussions on the availability of land within the EDF Energy estate for inclusion within the Onshore Site Selection Study Area for siting of substations.</p> <p>EDF Energy clarified that any land associated with the Sizewell C New Nuclear Power Station development was not available for voluntary acquisition due to the large proportion of land required to compensate and mitigate potential ecological</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>impacts associated with the Sizewell C New Nuclear Power Station development. Discussion with EDF Energy confirmed that work in these areas is already underway. Therefore, it was concluded that there was no reasonable prospect of the necessary certificate or compulsory acquisition powers over this land being obtained.</p> <p>The Applicant would therefore be required to rely upon seeking and exercising powers of compulsory acquisition over EDF Energy land for onshore substation siting through the DCO process. EDF Energy has advised the Applicant that it is unable to accept the imposition of compulsory acquisition powers over its land given their need to protect the safety and security of Sizewell B Nuclear Power Station. As such, significant objections were likely to be raised by EDF Energy to the Applicant's application which would require the necessary compulsory acquisition of EDF Energy land.</p>
005	Consideration of land use	RR-027, RR-043, RR-044, RR-148, RR-149, RR-178, RR-197, RR-274, RR-416, RR-423, RR-435, RR-446, RR-447, RR-462, RR-471, RR-473, RR-476, RR-477, RR-487, RR-491, RR-493, RR-496, RR-499, RR-509, RR-511, RR-513, RR-527, RR-528, RR-531, RR-535, RR-540, RR-541, RR-545, RR-567, RR-568, RR-577, RR-589, RR-599, RR-625, RR-627, RR-632, RR-640, RR-649, RR-650, RR-651, RR-652, RR-653, RR-655, RR-665, RR-670, RR-680, RR-690, RR-693, RR-702, RR-741, RR-743, RR-746, RR-754, RR-764, RR-772,	<p>The Applicant notes comments within Relevant Representations regarding the consideration of land use as part of the site selection process.</p> <p>Section 4.9.1.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the site selection principles for the onshore substations and National Grid infrastructure. With regards to land use, the Applicant has applied the Horlock Rules (see Table 4.4), NPS EN-1, EN-3 and EN-5 and the Electricity Act 1989 and followed a framework of site selection principles which include:</p> <ul style="list-style-type: none"> • Avoid residential titles (including whole garden) where possible; • Avoid direct significant impacts to internationally and nationally designated areas (e.g. SACs, SPAs, and SSSIs etc.); • Minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction;



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-775, RR-782, RR-783, RR-790, RR-795, RR-797, RR-798, RR-801, RR-803, RR-816, RR-818, RR-819, RR-823, RR-833, RR-837, RR-851, RR-866, RR-877, RR-882, RR-887, RR-904, RR-909, RR-911, RR-912, RR-919	<ul style="list-style-type: none"> • Minimise interaction with mature woodland; and • Avoid physical interaction with land and assets owned by EDF Energy to reduce consenting and land transaction risks associated with interfering with a statutory undertaker and nuclear operator's rights; <p>Additionally, a 'target' buffer of 250m from residential properties was applied as a proxy for minimising disturbance to residents. It is recognised that substation locations may encroach into this buffer once a final arrangement is determined, but identifying the buffer at this stage enabled the identification of substation zones for further investigation (section 4.9.1.3).</p> <p>Further to the principles above, a desk-based RAG methodology was one of the tools used to inform onshore substation site selection across seven potential zones. The RAG assessment (section 3.4 of Appendix 4.2 (APP-443) considered the following constraints with respect to land use:</p> <ul style="list-style-type: none"> • Presence of residential properties; • PRoWs and Nature Trails; • Agricultural Land Classifications; and • Sensitive Land Uses (Schools and Hospitals) <p>Please see Appendix 4.2 (APP-433) for further information on the weighting applied to land use considerations against other constraints.</p>
006	Consideration of archaeology and cultural heritage	RR-027, RR-028, RR-043, RR-044, RR-069, RR-088, RR-128, RR-149, RR-151, RR-171, RR-173, RR-183, RR-186, RR-193, RR-194, RR-195, RR-197, RR-200, RR-202, RR-222,	The Applicant notes comments within Relevant Representations regarding the consideration of archaeology and cultural heritage as part of the site selection process.



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-243, RR-276, RR-300, RR-302, RR-315, RR-322, RR-331, RR-333, RR-358, RR-382, RR-416, RR-435, RR-446, RR-462, RR-464, RR-473, RR-487, RR-494, RR-509, RR-513, RR-527, RR-535, RR-540, RR-541, RR-542, RR-545, RR-567, RR-568, RR-589, RR-595, RR-597, RR-605, RR-640, RR-650, RR-674, RR-690, RR-693, RR-698, RR-702, RR-736, RR-743, RR-761, RR-764, RR-772, RR-778, RR-781, RR-782, RR-783, RR-818, RR-819, RR-821, RR-823, RR-882, RR-887, RR-888, RR-909,	<p>Proximity to national and regional designations (Scheduled Monuments, Grade I, II and II* Listed Buildings) were considered during the onshore substations and National Grid substation site selection (Appendix 4.2 (APP-443)).</p> <p>The data sources available to the Applicant at the time of the site selection process are outlined in section 3.3 of Appendix 4.2. It is not standard, nor required by guidance or best practice, to have completed a detailed assessment at that stage of a project's development. Impacts on cultural heritage settings were considered through the identification of archaeological and cultural heritage designations (Scheduled Monuments and Grade II Listed Buildings and above); and consideration of the proximity of these designated assets to the substation zones considered within the Red/Amber/Green (RAG) Assessment for Onshore Substations Site Selection in the Sizewell Area (Appendix B of Appendix 4.2).</p> <p>A buffer of approximately 500m was applied to both national and regional designations. The 500m buffer was deemed appropriate as part of a desk-based exercise to identify potential impacts associated with archaeology and cultural heritage assets (including setting impacts). This buffer distance was discussed and agreed with the Site Selection Expert Topic Group (ETG) comprising of Suffolk County Council, Suffolk Coastal and Waveney District Council²¹, Natural England, Historic England, the Environment Agency and the Suffolk Coast and Heaths AONB.</p> <p>Any project assets (i.e. SPR onshore substations or National Grid substation) sited within this buffer were allocated an Amber score (Appendix 4.2); which allowed potential impacts to archaeology and cultural heritage assets (including consideration of settings) to be taken into account in terms of the site selection process. For clarity, each development consideration was given a score of Red / Amber / Green. These scores indicate the adverse or positive attributes to development respectively. The</p>

²¹ Now East Suffolk Council



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			specific definition of each Red / Amber / Green category is appended in Appendix B of Appendix 4.2 .
007	Consideration of landscape	RR-027, RR-043, RR-044, RR-069, RR-088, RR-094, RR-095, RR-096, RR-099, RR-115, RR-117, RR-126, RR-128, RR-130, RR-133, RR-137, RR-138, RR-140, RR-148, RR-149, RR-151, RR-155, RR-171, RR-173, RR-178, RR-183, RR-186, RR-187, RR-188, RR-193, RR-194, RR-197, RR-202, RR-204, RR-219, RR-222, RR-224, RR-230, RR-232, RR-249, RR-252, RR-264, RR-272, RR-276, RR-281, RR-284, RR-298, RR-302, RR-315, RR-321, RR-325, RR-331, RR-333, RR-353, RR-357, RR-358, RR-359, RR-364, RR-366, RR-369, RR-370, RR-382, RR-400, RR-403, RR-406, RR-408, RR-409, RR-416, RR-423, RR-424, RR-427, RR-429, RR-430, RR-435, RR-437, RR-439, RR-440, RR-441, RR-442, RR-446, RR-447, RR-454, RR-456, RR-458, RR-462, RR-464, RR-467, RR-471, RR-473, RR-476, RR-477, RR-478, RR-479, RR-487, RR-490, RR-491, RR-492, RR-493, RR-496, RR-499, RR-504, RR-506, RR-509, RR-510,	<p>The Applicant notes comments within Relevant Representations regarding the consideration of landscape as part of the site selection process.</p> <p>Section 4.9.1.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the site selection principles for the onshore substations and National Grid infrastructure. With regards to landscape, the Applicants have applied the Horlock Rules (see Table 4.4), NPS EN-1, EN-3 and EN-5 and the Electricity Act 1989 and followed a framework of site selection principles which aimed to minimise significant impacts to the special qualities of the Suffolk Coast and Heaths AONB.</p> <p>Seven potential zones for onshore substations were identified through the site selection study area (section 4.9.1.2 of Chapter 4 Site Selection and Assessment of Alternatives). The Suffolk Coast and Heaths AONB impact appraisal (Appendix 4.3) used the 'natural beauty' indicators as indicators for landscape qualities of the AONB. Each substation zone was assessed against each 'natural beauty' indicator assessing the magnitude of change to the special quality and potential effect on the AONB special qualities. The appraisal concluded that if the substation(s) were to be sited in or immediately adjacent to the AONB then there were likely to be significant effects on the special qualities of the AONB, and if sited within the western substation zones, there were likely to be no significant effects on the special qualities of the AONB.</p> <p>The selected onshore substation location avoids all international, national, county and local landscape designations. It does not affect any ancient woodland and mitigation measures ensure hedgerow loss which would occur is compensated for in new planting around the onshore substation. The site benefits from existing natural screening provided by Grove Wood and Laurel Covert, as well as other smaller tree blocks and hedgerows surrounding the site. These landscape features provide</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-511, RR-513, RR-527, RR-528, RR-531, RR-532, RR-535, RR-540, RR-541, RR-545, RR-552, RR-561, RR-564, RR-567, RR-568, RR-577, RR-587, RR-589, RR-596, RR-597, RR-599, RR-625, RR-627, RR-632, RR-640, RR-649, RR-650, RR-651, RR-652, RR-653, RR-655, RR-670, RR-676, RR-680, RR-690, RR-693, RR-694, RR-701, RR-702, RR-741, RR-743, RR-746, RR-754, RR-756, RR-761, RR-764, RR-772, RR-775, RR-782, RR-783, RR-790, RR-795, RR-797, RR-798, RR-801, RR-803, RR-806, RR-811, RR-816, RR-818, RR-819, RR-823, RR-833, RR-837, RR-847, RR-848, RR-850, RR-851, RR-852, RR-859, RR-862, RR-866, RR-877, RR-882, RR-887, RR-888, RR-893, RR-899, RR-904, RR-905, RR-908, RR-909, RR-911, RR-912, RR-916, RR-918, RR-919	screening principally from the east and create a wooded backdrop in views from other directions, below which the height of the onshore substation and National Grid substation will be contained and in so doing, contribute to the mitigation of landscape and visual effects (section 29.3.3 of Chapter 29 Landscape Visual Impact Assessment).
008	Consideration of traffic	RR-043, RR-050, RR-065, RR-088, RR-095, RR-148, RR-149, RR-154, RR-197, RR-238, RR-274, RR-281, RR-315, RR-375, RR-388, RR-420, RR-435, RR-447, RR-458, RR-471, RR-473, RR-476, RR-477, RR-487,	The Applicant notes comments within Relevant Representations regarding the consideration of traffic as part of the site selection process. Section 4.9.1.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052) describes the site selection principles for the onshore substations and National Grid infrastructure. With regards to traffic, the Applicants have applied the



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-496, RR-509, RR-513, RR-514, RR-527, RR-528, RR-529, RR-531, RR-535, RR-545, RR-547, RR-552, RR-567, RR-571, RR-577, RR-589, RR-627, RR-632, RR-640, RR-649, RR-650, RR-652, RR-653, RR-665, RR-670, RR-680, RR-685, RR-690, RR-693, RR-702, RR-719, RR-741, RR-743, RR-746, RR-754, RR-757, RR-772, RR-775, RR-782, RR-783, RR-790, RR-795, RR-798, RR-801, RR-816, RR-818, RR-819, RR-823, RR-837, RR-843, RR-850, RR-851, RR-852, RR-866, RR-877, RR-887, RR-905, RR-909, RR-911, RR-912, RR-917, RR-919	<p>Horlock Rules (see Table 4.4), NPS EN-1, EN-3 and EN-5 and the Electricity Act 1989 and followed a framework of site selection principles which aimed to minimise disruption to landowners, services, road users and residents generally, prioritising voluntary (rather than compulsory powers of) acquisition and minimising disruption during construction.</p> <p>The culmination of the various work streams as described in section 4.9.1.3 enabled the Applicants to decide that the substation zone northeast of Friston (Zone 7) as the selected zone to be taken forward. Following confirmation of the decision to proceed with Zone 7, the Local Planning Authorities were provided with further information to support this decision which included a high-level assessment of obtaining access for construction traffic to the Zone 7 substation zone (Appendix 4.4 (APP-455)). The Traffic and Access – Substation Zone 7 Appraisal concluded that an initial review of highway geometry demonstrates that there are feasible access routes to the Zone 7 substation zone.</p>
009	Consideration of flooding	RR-027, RR-042, RR-043, RR-044, RR-069, RR-094, RR-095, RR-105, RR-126, RR-131, RR-133, RR-148, RR-149, RR-155, RR-173, RR-178, RR-188, RR-197, RR-202, RR-220, RR-224, RR-238, RR-244, RR-258, RR-268, RR-272, RR-281, RR-298, RR-300, RR-308, RR-357, RR-358, RR-359, RR-366, RR-369, RR-370, RR-375, RR-389, RR-408, RR-426,	<p>The Applicant notes comments within Relevant Representations regarding the consideration of flood risk as part of the site selection process.</p> <p>During the process of defining the onshore substations site selection study area (section 4.9.1.2.4 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)), any areas listed as Flood Zone 3 were excluded from the search. Flood zones are defined as follows:</p> <ul style="list-style-type: none"> Flood Zone 3 is defined by Environment Agency's online Flood Map for Planning as land with a high risk of flooding;



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-427, RR-437, RR-439, RR-441, RR-442, RR-443, RR-446, RR-447, RR-453, RR-458, RR-462, RR-464, RR-467, RR-468, RR-473, RR-474, RR-487, RR-491, RR-498, RR-499, RR-531, RR-532, RR-540, RR-541, RR-545, RR-546, RR-558, RR-559, RR-571, RR-577, RR-589, RR-610, RR-626, RR-632, RR-649, RR-650, RR-651, RR-653, RR-665, RR-670, RR-685, RR-690, RR-706, RR-709, RR-715, RR-721, RR-756, RR-761, RR-772, RR-775, RR-781, RR-782, RR-783, RR-786, RR-802, RR-803, RR-815, RR-816, RR-818, RR-819, RR-827, RR-835, RR-837, RR-851, RR-852, RR-864, RR-865, RR-874, RR-876, RR-879, RR-880, RR-882, RR-887, RR-902, RR-904, RR-908, RR-909	<ul style="list-style-type: none"> Flood zone 3a is land having a 1 in 100 or greater annual probability of river flooding or 1 in 200 of sea flooding; and Flood zone 3b is categorised as a high functional floodplain where water has to flow or be stored in times of flood (section 20.3.2 of Appendix 20.3 (APP-496)). <p>As part of the RAG assessment (Appendix 4.2 (APP-443)), the following constraints relating to flood risk were considered:</p> <ul style="list-style-type: none"> Proximity to licensed abstraction points; Presence of potentially contaminated land; Source Protection Zone; and Proximity to fluvial flood risk. <p>The proposed substation location is not located in proximity to any land of Flood Zone 3 and therefore a green risk rating was assigned. Further information regarding flood risk zones is provided in section 20.5.1.4 of Chapter 20 Water Resources and Flood Risk (APP-068).</p>
010	Consideration of noise	RR-027, RR-043, RR-044, RR-071, RR-095, RR-115, RR-126, RR-128, RR-133, RR-149, RR-154, RR-158, RR-173, RR-174, RR-183, RR-187, RR-193, RR-194, RR-197, RR-202, RR-238, RR-276, RR-284, RR-315,	<p>The Applicant notes comments within Relevant Representations regarding the consideration of noise as part of the site selection process.</p> <p>Potential noise impacts were considered as part of the initial CION process for the grid connection location (section 4.7.5 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052)). Table 4.3 summarises how noise was considered for the different options.</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-331, RR-382, RR-416, RR-435, RR-445, RR-446, RR-447, RR-456, RR-458, RR-462, RR-462, RR-464, RR-467, RR-471, RR-473, RR-476, RR-477, RR-487, RR-499, RR-504, RR-509, RR-513, RR-527, RR-535, RR-545, RR-547, RR-567, RR-568, RR-571, RR-577, RR-596, RR-597, RR-598, RR-589, RR-632, RR-640, RR-649, RR-650, RR-652, RR-653, RR-680, RR-685, RR-690, RR-693, RR-702, RR-719, RR-736, RR-741, RR-743, RR-746, RR-754, RR-760, RR-764, RR-772, RR-775, RR-782, RR-783, RR-795, RR-797, RR-798, RR-801, RR-803, RR-816, RR-818, RR-819, RR-821, RR-823, RR-835, RR-837, RR-840, RR-851, RR-852, RR-877, RR-885, RR-887, RR-899, RR-904, RR-908, RR-909, RR-911, RR-912,	<p>During the site selection process of defining the onshore substation zones (section 4.9.1.3), the Applicants undertook consultation with the Local Planning Authorities in July 2017 via the Site Selection Expert Topic Group (ETG). The ETG indicated that an appropriate buffer should be applied to residential properties as a proxy for the minimisation of potential impacts associated with noise and visual impacts. A 'target' buffer of 250m from residential properties was applied as a guide and the onshore substation site selection study area was subdivided into zones based on available space for co-location of the onshore substation and the National Grid substation, whilst minimising interaction with the 250m target buffer on residential properties as much as possible. It is recognised that substation locations may encroach into this target buffer once a final arrangement is determined but identifying the buffer at this stage enabled the identification of substation zones for further investigation.</p> <p>Presence of residential properties was included as a constraint within the subsequent RAG assessment (Appendix 4.2 (APP-443)) for the onshore substations.</p>
011	Consideration of tourism	RR-027, RR-044, RR-050, RR-128, RR-148, RR-158, RR-173, RR-174, RR-186, RR-187, RR-197, RR-220, RR-222, RR-230, RR-232, RR-238, RR-249, RR-300, RR-315, RR-325,	<p>Areas of local amenity value in the location of the onshore substations have been protected as far as reasonably practicable as part of the site selection process. As described in section 4.9.2.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052), the key site selection principles relating to recreation include:</p>



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-380, RR-416, RR-420, RR-435, RR-456, RR-458, RR-462, RR-464, RR-467, RR-471, RR-473, RR-487, RR-494, RR-499, RR-509, RR-511, RR-513, RR-524, RR-527, RR-528, RR-529, RR-530, RR-531, RR-535, RR-542, RR-552, RR-567, RR-568, RR-577, RR-596, RR-597, RR-604, RR-627, RR-640, RR-649, RR-650, RR-651, RR-652, RR-653, RR-655, RR-670, RR-674, RR-680, RR-684, RR-690, RR-693, RR-698, RR-700, RR-702, RR-741, R-742, RR-757, RR-761, RR-775, RR-782, RR-783, RR-797, RR-798, RR-801, RR-811, RR-818, RR-819, RR-821, RR-823, RR-850, RR-851, RR-859, RR-866, RR-877, RR-887, RR-888, RR-899, RR-904, RR-911, RR-912, RR-919	<ul style="list-style-type: none"> • Avoiding proximity to residential dwellings; • Avoiding proximity to historic buildings; • Avoiding siting permanent operational onshore infrastructure (the onshore substation and National Grid infrastructure) within the AONB and other designated sites (such as common land); and • Minimising impacts to local residents in relation to access to services and road usage, including footpath closures; <p>The subsequent RAG assessment (Appendix 4.2 (APP-443)) for the location of the onshore substations further considered the above principles by assigning a risk rating to constraints for drivers of tourism (Archaeology, Ecology, Landscape and Community) (see section 3.4 of Appendix 4.2). Please see the Applicant's responses to members of the public / businesses Relevant Representations regarding tourism in Table 30 for further information on potential impacts to tourism.</p>

2.27 Seascape

Table 27 Applicant's Comments on Seascape

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Visibility of turbines	RR-332, RR-446, RR-519, RR-525.	<p>The Applicant notes comments raised within Relevant Representations regarding the visibility of turbines.</p> <p>Appendix 28.8 (APP-563) presents an assessment of the potential locations and duration over which the Projects would be visible from the coast. Visualisations show what the turbines may look like from agreed viewpoints along the coastline, as shown in Figures 28.24 – 28.60 (APP-353 – APP-390) for East Anglia TWO and Figure 28.25 – 28.45 (APP-) for East Anglia ONE North.</p> <p>The closest viewpoints (32.5km from the East Anglia TWO windfarm site (Figure 28.28a-i (APP-358) and 35.7km from the East Anglia ONE North windfarm site (Figure 28.28a-g (APP-355)) represent the worst case locations to experience visibility for the wind turbines. At these locations, the East Anglia TWO wind turbines are likely to only be visible to the public 33% of the time (under excellent visibility conditions) and the East Anglia ONE North wind turbines are likely to only be visible to the public 26% of the time (under excellent visibility conditions). Away from these viewpoints and further from the windfarm sites, the likelihood of wind turbine visibility decreases. For example, at the furthest viewpoint surveyed (53.5km from the windfarm sites (Figure 28.41a-g (APP-371) and Figure 28.37a-g (APP-367))), likelihood of visibility for the wind turbines is only 15% for East Anglia TWO and 9% for East Anglia ONE North (under excellent visibility conditions).</p>
002	Impacts on onshore receptors	RR-019, RR-277, RR-606.	<p>The Applicant notes Relevant Representations which raised queries with regards to the impacts on onshore receptors from the offshore infrastructure.</p> <p>Chapter 28 Seascape, Landscape and Visual Impact Assessment (SLVIA) (APP-076) identifies and assesses the significance of changes resulting from the</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>construction and operation of the offshore infrastructure. The assessment is carried out in relation to both the seascape character and landscape character as environmental resources in their own right, and on people's views and visual amenity. These assessments are detailed in Appendix 28.3 Seascape Assessment (APP-558), Appendix 28.4 Landscape Assessment (APP-559), Appendix 28.5 Viewpoint Assessment (APP-560), Appendix 28.6 Suffolk Coastal Path Assessment (APP-561) and Appendix 28.7 Cumulative SL VIA (APP-562).</p> <p>As discussed in section 28.13 of Chapter 28 SL VIA (APP-076), in seascape, landscape and visual terms, it is considered that the construction and operation of the offshore infrastructure extends the influence of the existing wind energy characteristics of the seascape and results in some effects on the character and views from the closest areas of the Suffolk coastline.</p> <p>The effects of the construction and operation of the East Anglia TWO offshore infrastructure cumulatively with the East Anglia ONE North offshore infrastructure are assessed as a 'total' cumulative effect resulting from both windfarm sites. In general, there are limited differences in the levels of magnitude of change and significance of effects set out in the Project assessment for the East Anglia TWO windfarm site, with the addition of East Anglia ONE North resulting in a relatively low change/addition, with the combined magnitude of change only being slightly higher in the northern parts of the study area than that resulting from the East Anglia TWO offshore infrastructure alone.</p> <p>Following submission of the Preliminary Environmental Information Report (PEIR), the East Anglia TWO windfarm site reduced its lateral spread resulting in less concentrated grouping of the wind turbines and an increased distance offshore (please see row 003 below). The revised layout of the East Anglia TWO windfarm site reduces cumulative landscape and visual effects.</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
003	Impacts on the horizon	RR-519, RR-332	<p>Consultation responses on the PEIR, focussed on the spread of wind turbines on the horizon as seen from the coast and the potential for cumulative impact with other projects. The Applicant therefore sought to determine if it was possible to reduce the area of the East Anglia TWO windfarm site, and its lateral spread, whilst maintaining commercial viability on the basis of the original generation capacity and wind turbine envelope. The north-south extent of the East Anglia TWO windfarm site was therefore reduced (by 9.68km on the western boundary and 8.03km on the east) in order to mitigate potential seascape impacts, without a reduction in wind turbine numbers or generation capacity. The windfarm boundary was reduced by a total area of 37km² from 255km² to 218km². This refinement is shown in Figure 4.3 (APP-032). The revised layout of the East Anglia TWO windfarm site reduces cumulative landscape and visual effects. The magnitude of change has reduced towards the lower threshold of medium in the assessment of many of the viewpoints. This is primarily due to the increase in open sea horizon or 'gap' between the East Anglia ONE North and East Anglia TWO windfarm sites; which increases the legibility of each as a windfarm in its own right (rather than visually merging to form one larger array).</p> <p>Section 28.13 of Chapter 28 SLVIA (APP-076) explains that the large scale of the open sea vistas and expansive views offshore is more likely to be able accommodate windfarm development than areas of more, complex seascape close to the shore.</p> <p>Due to the relatively low elevation of the viewpoints along much of the coast, the simple form of the coastline and the long distance offshore to the windfarm sites, the windfarm sites will be seen on and beyond the horizon. They will be seen as 'horizon developments' to a large open seascape, rather than being viewed 'within' its seascape/landscape.</p>
004	Impacts on the Area of Outstanding	RR-019, RR-023, RR-070, RR-332, RR-519.	<p>Section 28.13 of Chapter 28 SLVIA (APP-076) explains that no physical attributes that contribute to the special qualities of the AONB will be changed as a result of the</p>

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
	Natural Beauty (AONB)		<p>construction and operation of the offshore infrastructure. The East Anglia TWO windfarm site, due to its location at some distance outside the AONB, only impacts on the perception of certain special qualities and these are aspects of landscape and scenic quality, relative wildness and relative tranquillity. The effect resulting from the East Anglia TWO windfarm site is assessed as significant (but of medium, rather than high magnitude) on the perception of specific landscape, scenic and relative wildness qualities that derive from changes to views from the AONB out to sea. This is from geographically limited areas along the immediate coastal edges of the AONB where these panoramic, long distances views offshore are an aspect of some of the special qualities.</p> <p>Full details of this assessment are provided in Table A28.3 AONB Special Quality Indicator Assessment in Appendix 28.4 Landscape Assessment (APP-559)</p> <p>It is not the overall character or physical features of the coastal edges of the AONB that will be changed, but instead it is specific aesthetic/perceptual aspects of its character relating to panoramic views offshore at the coast that will experience change.</p> <p>The construction and operation of the offshore infrastructure will have a relatively low change to the strong overall character of the AONB and will not result in harm to the special qualities of the AONB in overall terms, with the varied and distinctive landscapes of the AONB continuing to define its fundamental character.</p>



2.28 Socio-Economics – Employment and Skills

Table 28 Applicant's Comments on Socio-Economics - Employment and Skills

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Construction employment	RR-025, RR-027, RR-042, RR-044, RR-049, RR-050, RR-074, RR-089, RR-095, RR-096, RR-100, RR-115, RR-144, RR-145, RR-148, RR-155, RR-169, RR-182, RR-186, RR-187, RR-193, RR-194, RR-203, RR-204, RR-213, RR-217, RR-222, RR-231, RR-236, RR-251, RR-252, RR-253, RR-272, RR-277, RR-287, RR-292, RR-295, RR-298, RR-308, RR-314, RR-315, RR-322, RR-323, RR-326, RR-330, RR-331, RR-343, RR-350, RR-354, RR-358, RR-359, RR-362, RR-365, RR-378, RR-386, RR-388, RR-397, RR-400, RR-401, RR-403, RR-426, RR-427, RR-428, RR-431, RR-432, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-447, RR-449, RR-454, RR-458, RR-462, RR-471, RR-473, RR-474, RR-499, RR-500, RR-531, RR-534, RR-539, RR-544, RR-546, RR-552, RR-555, RR-562, RR-567, RR-568, RR-575, RR-576, RR-577, RR-600, RR-610, RR-613, RR-617, RR-621, RR-626, RR-627, RR-630, RR-631, RR-632, RR-633, RR-649, RR-651, RR-652, RR-653, RR-674, RR-682, RR-684, RR-685, RR-686, RR-709, RR-711, RR-715, RR-719, RR-721, RR-728, RR-736, RR-745, RR-761, RR-765, RR-767, RR-772, RR-775, RR-787, RR-794, RR-811,	<p>A number of representations raise concerns with the potential local benefits in terms of what the construction of the Project would mean in terms of employment, particularly local employment opportunities.</p> <p>Chapter 30 Tourism, Recreation and Socio-Economics (APP-078) provides an assessment of the likely employment opportunities during construction. Note that employment estimates are in terms of Full Time Equivalent (FTE) jobs per year and do not equate to actual employee numbers (which will fluctuate). In addition to direct employment there are also assumptions around indirect and induced employment (i.e. supporting service and supply chain).</p> <p>Section 30.6.1.1 Impact 1a: Onshore Construction Employment covers onshore construction related employment. Peak staff on site would be 249, with FTEs an average of 167. It is estimated that 36% of the construction workforce could be local (i.e. within a 60-minute drive).</p> <p>In terms of the supply chain, Section 30.6.1.1 Impact 1a: Onshore Construction Employment shows the estimates for onshore employment. Locally (i.e. within an hour drive of the onshore study area) the supply chain is estimated to account for an average of 26 FTEs and regionally (the New Anglia Local Enterprise Partnership (NALEP) area which covers Norfolk and Suffolk) there would be a further 47 FTEs.</p> <p>Section 30.6.1.2 Impact 1b: Offshore Construction Employment covers offshore construction related employment. It is estimated that 100 - 300 direct FTE could be generated regionally (within the NALEP). This is likely to be generated from installation and commissioning work, with the manufacturing assumed to be outside the region. Nationally, FTEs from manufacturing would range from 1,600 to 4,100.</p>



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No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-816, RR-829, RR-834, RR-835, RR-854, RR-868, RR-869, RR-874, RR-876, RR-882, RR-902, RR-911, RR-912.	<p>Section 30.6.1.3 Impact 2: Tourism and Hospitality Sector Employment covers the hospitality trade. Given that some of the onshore construction workers will travel to the area and stay in local accommodation, this demand for accommodation would translate to potentially 7 FTEs in tourism and hospitality.</p> <p>The cumulative assessment for the Projects looks at two scenarios, in the worst case of the Projects being constructed simultaneously, efficiencies in scale mean that onshore construction FTEs would increase to 197 with 307 peak staff (see Section 30.7.1 Cumulative Impact with proposed East Anglia ONE North Project, Table 30.82)</p> <p>Acknowledging the limitations and the potential to update the assessment for revised Sizewell C figures, Table 30.89 illustrates the potential magnitude of effect of the Projects and Sizewell C being constructed with overlapping peak periods. This would require 3.05% of the regional labour market for these skills.</p>
002	Operational employment	RR-025, RR-027, RR-042, RR-044, RR-049, RR-050, RR-074, RR-089, RR-095, RR-096, RR-115, RR-132, RR-133, RR-141, RR-144, RR-145, RR-148, RR-155, RR-169, RR-182, RR-183, RR-186, RR-187, RR-193, RR-194, RR-196, RR-199, RR-203, RR-204, RR-213, RR-217, RR-222, RR-231, RR-236, RR-251, RR-252, RR-253, RR-272, RR-277, RR-292, RR-295, RR-298, RR-308, RR-310, RR-313, RR-314, RR-315, RR-318, RR-322, RR-323, RR-326, RR-328, RR-330, RR-331, RR-343, RR-350, RR-354, RR-358, RR-359, RR-362, RR-365, RR-368, RR-374, RR-375, RR-378, RR-382, RR-386, RR-388, RR-389, RR-390, RR-397, RR-400, RR-401, RR-403, RR-406,	<p>A number of representations raise concerns with the potential local benefits in terms of what the operation of the Project would mean in terms of employment, particularly local employment opportunities.</p> <p>Section 30.6.2.1 Impact 1: Long Term Employment covers operational employment. It is estimated that regional offshore direct employment would be between 100 – 300 FTE jobs. These would be jobs related to the operation and maintenance of the offshore windfarm itself. There is potential for a further 100 – 400 FTE jobs within the supply chain regionally. Nationally there would be further FTEs associated with the supply chain. Onshore requirements would be limited to maintenance only as the substation will be unmanned.</p> <p>Offshore operational assumptions are that each project would be run separately, hence operational employment is doubled for the cumulative scenario (Table 30.82).</p>



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No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-413, RR-447RR-416, RR-418, RR-419, RR-421, RR-426, RR-427, RR-428, RR-431, RR-432, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-447, RR-449, RR-451, RR-454, RR-461, RR-471, RR-473, RR-474, RR-499, RR-500, RR-505, RR-507, RR-509, RR-527, RR-528, RR-531, RR-534, RR-536, RR-539, RR-540, RR-541, RR-542, RR-544, RR-546, RR-552, RR-555, RR-562, RR-567, RR-568, RR-575, RR-576, RR-577, RR-598, RR-599, RR-600, RR-610, RR-617, RR-621, RR-624, RR-626, RR-627, RR-630, RR-631, RR-632, RR-633, RR-637, RR-649, RR-651, RR-652, RR-653, RR-666 RR-670, RR-674, RR-682, RR-684, RR-685, RR-686, RR-693, RR-698, RR-699, RR-709, RR-711, RR-715, RR-721, RR-735, RR-736, RR-745, RR-761, RR-765, RR-772, RR-779, RR-794, RR-798, RR-801, RR-802, RR-811, RR-816, RR-821, RR-827, RR-829, RR-834, RR-835, RR-847, RR-855, RR-868, RR-869, RR-871, RR-873, RR-874, RR-876, RR-881, RR-882, RR-885, RR-897, RR-902, RR-906, RR-911, RR-912, RR-917, RR-919.	
003	Skills	RR-049, RR-050, RR-074, RR-089, RR-132, RR-133, RR-141, RR-145, RR-148, RR-169, RR-182, RR-183, RR-187, RR-196, RR-199, RR-203, RR-217, RR-231, RR-236, RR-253, RR-310, RR-318, RR-323, RR-326, RR-328,	<p>The Applicant notes queries in Relevant Representations regarding skills training commitments.</p> <p>Skills commitments are covered in section 30.3.3.1 Skills and Training Enhancement.</p>



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No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-331, RR-354, RR-365, RR-368, RR-374, RR-375, RR-378, RR-382, RR-386, RR-388, RR-389, RR-390, RR-401, RR-403, RR-406, RR-413, RR-416, RR-418, RR-419, RR-421, RR-426, RR-427, RR-428, RR-431, RR-432, RR-437, RR-439, RR-441, RR-443, RR-446, RR-447, RR-451, RR-454, RR-461, RR-462, RR-467, RR-468, RR-499, RR-500, RR-505, RR-507, RR-509, RR-527, RR-528, RR-534, RR-536, RR-539, RR-540, RR-541, RR-542, RR-552, RR-567, RR-568, RR-577, RR-598, RR-599, RR-600, RR-608, RR-617, RR-621, RR-624, RR-630, RR-631, RR-632, RR-633, RR-637, RR-649, RR-651, RR-652, RR-653, RR-654, RR-666, RR-670, RR-674, RR-682, RR-684, RR-693, RR-698, RR-699, RR-728, RR-735, RR-741, RR-743, RR-745, RR-762, RR-764, RR-779, RR-785, RR-790, RR-816, RR-851, RR-864, RR-865, RR-871, RR-873, RR-881, RR-885, RR-911, RR-912, RR-917	<p>The Applicant is in the process of developing four windfarms off the coast of Suffolk. A Skills Strategy was formally agreed with Suffolk County Council (SCC) as a planning condition for East Anglia ONE. The parties have agreed that the previously agreed planning condition and East Anglia ONE Skills Strategy could be more effectively delivered in a more collaborative and less transactional way. This would allow both parties to promote Science, Technology, Engineering, and Mathematics (STEM) career opportunities in the offshore wind sector.</p> <p>Section 30.3.3.1 of Chapter 30 Tourism, Recreation and Socioeconomics (APP-078) includes details of a Skills Strategy and a Memorandum of Understanding (MoU) with SCC for East Anglia ONE. This has subsequently been maintained as part of the East Anglia THREE project.</p> <p>The Applicant is developing a skills and training MoU with East Suffolk Council and Suffolk County Council for the Project</p>



2.29 Socio-Economics – House Prices

Table 29 Applicant's Comments on Socio-Economics - House Prices

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Concerns relating to possible reduction in value to properties	RR-027, RR-044, RR-089, RR-093, RR-127, RR-128, RR-132, RR-133, RR-154, RR-155, RR-162, RR-165, RR-171, RR-193, RR-194, RR-196, RR-198, RR-199, RR-200, RR-222, RR-231, RR-243, RR-251, RR-253, RR-253, RR-276, RR-280, RR-299, RR-300, RR-302, RR-303, RR-310, RR-315, RR-317, RR-323, RR-328, RR-350, RR-352, RR-367, RR-374, RR-376, RR-377, RR-380, RR-383, RR-382, RR-397, RR-401, RR-408, RR-416, RR-421, RR-424, RR-423, RR-435, RR-445, RR-446, RR-447, RR-451, RR-464, RR-475, RR-487, RR-488, RR-493, RR-498, RR-499, RR-500, RR-509, RR-527, RR-535, RR-536, RR-540, RR-541, RR-547, RR-567, RR-568, RR-598, RR-605, RR-622, RR-637, RR-640, RR-652, RR-658, RR-660, RR-671, RR-674, RR-693, RR-702, RR-713, RR-714, RR-722, RR-723, RR-736, RR-748, RR-751, RR-761, RR-762, RR-766, RR-770, RR-771, RR-781, RR-782, RR-783, RR-794, RR-796, RR-817, RR-821, RR-823, RR-829, RR-839, RR-843, RR-867, RR-881, RR-887, RR-888, RR-889, RR-890, RR-893, RR-895, RR-903, RR-909.	<p>A number of Relevant Representations raise concerns with regards to reduction in the value of properties and house prices.</p> <p>The impact of the Project on house prices is not a material consideration. There are many reasons why house prices vary, and, in any event, policy does not seek to prohibit activities which may have such effects. National Policy Statements (NPS) do however offer specific policy support for the assessment of effects that a project may have on residential receptors. The Environmental Statement has provided appropriate impact assessment on residential receptors in line with the overarching NPS in relation to Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Networks Infrastructure (EN-5). The potential impact on residential receptors has been considered throughout the development of the Project and this is reflected in the site selection process reported in Chapter 4 Site Selection and Assessment of Alternatives (APP-052). In addition, the potential effects on residential receptors and residents has been further considered and evaluated in other topic specific chapters, including Chapter 19 Air Quality (APP-067), Chapter 25 Noise and Vibration (APP-073), Chapter 74 Traffic and Transport (APP-074), Chapter 27 Human Health (APP-075) and Chapter 29 Landscape and Visual Impact Assessment (APP-077).</p> <p>The potential impact on non-residential land uses has been evaluated through Chapter 21 Land Use (APP-069) and Chapter 30 Tourism, Recreation and Socio-Economics (APP-078). Appendix 21.1 (APP-499) details the relevant consultation undertaken. It is noted that, in terms of subsection 87(3) of the Planning Act 2008, representations that relate to compensation for compulsory acquisition of land or of an interest in or right over land are matters which the ExA may disregard.</p>



2.30 Tourism and Hospitality

Table 30 Applicant's Comments on Tourism and Hospitality

No	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General	RR-022, RR-040, RR-042, RR-043, RR-044, RR-049, RR-050, RR-051, RR-068, RR-069, RR-070, RR-071, RR-074, RR-075, RR-076, RR-089, RR-093, RR-095, RR-097, RR-099, RR-103, RR-104, RR-105, RR-106, RR-112, RR-113, RR-117, RR-121, RR-122, RR-123, RR-125, RR-129, RR-130, RR-132, RR-133, RR-134, RR-135, RR-136, RR-137, RR-141, RR-143, RR-144, RR-145, RR-146, RR-148, RR-151, RR-154, RR-155, RR-156, RR-158, RR-159, RR-160, RR-162, RR-165, RR-166, RR-168, RR-169, RR-171, RR-173, RR-174, RR-178, RR-182, RR-183, RR-185, RR-186, RR-187, RR-189, RR-193, RR-194, RR-195, RR-196, RR-197, RR-198, RR-199, RR-200, RR-201, RR-203, RR-204, RR-206, RR-207, RR-208, RR-209, RR-212, RR-213, RR-214, RR-215, RR-216, RR-217, RR-225, RR-226, RR-229, RR-230, RR-234, RR-236, RR-243, RR-246, RR-247, RR-248, RR-249, RR-250, RR-251, RR-252, RR-253, RR-254, RR-258, RR-259, RR-260, RR-262, RR-263, RR-264, RR-265, RR-266, RR-267, RR-269, RR-271, RR-272, RR-275, RR-277, RR-278, RR-279, RR-287, RR-291, RR-298, RR-312, RR-315, RR-317, RR-322, RR-325, RR-327, RR-328, RR-335, RR-341, RR-342, RR-343, RR-344, RR-346, RR-348, RR-350, RR-352, RR-353, RR-357, RR-358, RR-361, RR-362, RR-363, RR-364, RR-371, RR-376, RR-377, RR-379, RR-380, RR-383, RR-385, RR-387, RR-388, RR-389,	<p>The Applicant notes queries in Relevant Representations regarding potential impacts on tourism and hospitality.</p> <p>Chapter 30 Tourism, Recreation and Socio-Economics (APP-078) provides an assessment of the tourism related effects of the Project. In addition, Appendix 30.2 (APP-571) provides further information on previous studies done on similar types of project.</p>



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		RR-396, RR-404, RR-405, RR-409, RR-411, RR-414, RR-440, RR-420, RR-428, RR-431, RR-432, RR-433, RR-436, RR-445, RR-449, RR-451, RR-453, RR-454, RR-456, RR-476, RR-477, RR-487, RR-450, RR-459, RR-460, RR-464, RR-465, RR-471, RR-473, RR-474, RR-478, RR-483, RR-490, RR-494, RR-495, RR-498, RR-502, RR-504, RR-508, RR-510, RR-511, RR-513, RR-516, RR-522, RR-524, RR-529, RR-530, RR-532, RR-536, RR-539, RR-543, RR-551, RR-554, RR-555, RR-558, RR-560, RR-562, RR-566, RR-570, RR-574, RR-575, RR-576, RR-581, RR-582, RR-583, RR-584, RR-585, RR-586, RR-589, RR-592, RR-594, RR-605, RR-601, RR-606, RR-608, RR-609, RR-610, RR-615, RR-619, RR-622, RR-624, RR-625, RR-626, RR-627, RR-628, RR-629, RR-632, RR-637, RR-643, RR-645, RR-650, RR-651, RR-652, RR-654, RR-655, RR-657, RR-658, RR-659, RR-661, RR-663, RR-666, RR-667, RR-670, RR-671, RR-675, RR-677, RR-678, RR-680, RR-682, RR-685, RR-686, RR-687, RR-688, RR-690, RR-692, RR-693, RR-694, RR-698, RR-700, RR-701, RR-703, RR-704, RR-707, RR-709, RR-710, RR-713, RR-714, RR-725, RR-731, RR-735, RR-738, RR-742, RR-743, RR-748, RR-751, RR-756, RR-757, RR-763, RR-773, RR-776, RR-782, RR-783, RR-785, RR-787, RR-791, RR-793, RR-794, RR-797, RR-800, RR-809, RR-814, RR-823, RR-827, RR-829, RR-834, RR-839, RR-840, RR-843, RR-847, RR-850, RR-851, RR-859, RR-873, RR-878, RR-880, RR-887, RR-888, RR-899, RR-903, RR-906, RR-915, RR-916, RR-918, RR-919, RR-723, RR-736, RR-739, RR-740, RR-781, RR-813,	



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No	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-815, RR-817, RR-824, RR-845, RR-857, RR-889, RR-890, RR-891, RR-892, RR-893, RR-896, RR-897, RR-904, RR-911, RR-912, RR-913,	
002	General effects on Suffolk tourism – construction disruption	RR-019, RR-021, RR-022, RR-023, RR-025, RR-042, RR-043, RR-044, RR-049, RR-050, RR-051, RR-068, RR-069, RR-072, RR-074, RR-076, RR-093, RR-095, RR-097, RR-099, RR-100, RR-102, RR-106, RR-112, RR-117, RR-121, RR-129, RR-134, RR-136, RR-137, RR-144, RR-148, RR-151, RR-173, RR-182, RR-188, RR-189, RR-194, RR-195, RR-197, RR-203, RR-208, RR-217, RR-221, RR-222, RR-223, RR-224, RR-225, RR-227, RR-229, RR-231, RR-232, RR-236, RR-238, RR-239, RR-240, RR-242, RR-244, RR-246, RR-250, RR-259, RR-261, RR-264, RR-265, RR-266, RR-268, RR-270, RR-271, RR-284, RR-291, RR-292, RR-295, RR-298, RR-299, RR-300, RR-309, RR-312, RR-314, RR-315, RR-318, RR-319, RR-322, RR-323, RR-326, RR-328, RR-335, RR-354, RR-365, RR-367, RR-368, RR-369, RR-370, RR-371, RR-375, RR-378, RR-382, RR-386, RR-387, RR-389, RR-390, RR-395, RR-398, RR-400, RR-401, RR-403, RR-403, RR-406, RR-410, RR-413, RR-416, RR-418, RR-419, RR-421, RR-426, RR-427, RR-428, RR-431, RR-432, RR-434, RR-435, RR-436, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-447, RR-448, RR-458, RR-461, RR-462, RR-467, RR-468, RR-487, RR-499, RR-500, RR-505, RR-507, RR-527, RR-539, RR-540, RR-541, RR-542, RR-543, RR-544, RR-546, RR-547, RR-552, RR-562, RR-565, RR-567, RR-568, RR-569, RR-574, RR-577,	<p>A number of responses highlight concerns with construction disturbance effects upon the tourism industry.</p> <p>Construction disturbance effects on tourism and recreation may potentially arise from two pathways:</p> <p>The first pathway is from direct impacts upon tourism and recreation assets during construction of the Project (i.e. physical disturbance – air quality, noise etc in Table 30.67, Table 30.68 and Table 30.69, Chapter 30 Tourism, Recreation and Socio-Economics). The assessment also takes account of construction effects from transport and these have been fully assessed in Chapter 26 - Traffic and Transport (APP-074), Section 26.6.1.11 and section 26.6.1.12. 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 (APP-068), Chapter 25 Noise and Vibration (APP-073) Chapter 26 Traffic and Transport (APP-074)).</p> <p>The second pathway is from the perception of large-scale developments as being an adverse impact on the area as a tourist destination. Whether there is a perception of development by visitors or potential visitors (and therefore an actual pathway for impact) will depend on two factors. Firstly, a development would need to be in the public eye and known to potential visitors. Although the Project is a Nationally Significant Infrastructure Project it is not an iconic project (e.g. 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. Indeed, this point is supported by the DMO report (<i>The Energy Coast Implications</i>,</p>



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			<p>mitigation commitments it is considered that these impacts would be of negligible significance (see Table 30.71 and Table 30.84).</p> <p>The Applicant has committed to carrying out full quantitative CIAs for these topics. The required information to inform this has now been submitted within the Sizewell C New Nuclear Power Station Application. The updated CIA (as appropriate) will be submitted during the Examination of the Project.</p> <p>It is not considered that the Applicant's Project will have significant impacts upon visitor perception during construction as it is not an iconic project likely to be in the public mind (see DMO Report referenced above) and direct impacts (e.g. air quality, noise) which could affect visitors in the area will be mitigated to not significant levels. It is accepted that Sizewell C New Nuclear Power Station does have a high public profile and indeed is linked by name with the area. Reports from EDF Energy Hardisty Jones Associates (2018)²² suggest that there could be potential impacts upon tourism and recreation from Sizewell C New Nuclear Power Station.</p> <p>The Applicant notes the proposed actions within the DMO report (<i>The Energy Coast Implications, impact & opportunities for tourism on the Suffolk Coast</i>) as mechanisms which could boost potential visitor awareness of the Suffolk Coast and its attractions.</p>

²² Hardisty Jones Associates (2018) Sizewell C Economic Impact Assessment. Appendices to the final report, Prepared for Suffolk Coastal and Waveney District Councils and Suffolk County Council. [Online]. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Economic-Impact/SZC-Economic-Impact-Appendices-v3.0.pdf>



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003	General effects on Suffolk tourism – businesses	RR-018, RR-019, RR-021, RR-022, RR-023, RR-025, RR-027, RR-040, RR-042, RR-044, RR-049, RR-050, RR-051, RR-068, RR-069, RR-074, RR-075, RR-076, RR-089, RR-093, RR-095, RR-096, RR-098, RR-102, RR-106, RR-112, RR-117, RR-121, RR-123, RR-125, RR-128, RR-129, RR-132, RR-133, RR-134, RR-135, RR-136, RR-137, RR-139, RR-143, RR-144, RR-148, RR-154, RR-155, RR-158, RR-159, RR-160, RR-166, RR-169, RR-171, RR-174, RR-178, RR-182, RR-183, RR-185, RR-186, RR-188, RR-193, RR-196, RR-200, RR-203, RR-204, RR-208, RR-216, RR-217, RR-221, RR-222, RR-223, RR-224, RR-225, RR-227, RR-229, RR-231, RR-232, RR-236, RR-238, RR-239, RR-240, RR-242, RR-243, RR-244, RR-246, RR-253, RR-254, RR-259, RR-261, RR-262, RR-264, RR-266, RR-268, RR-269, RR-270, RR-271, RR-277, RR-280, RR-284, RR-292, RR-295, RR-298, RR-299, RR-300, RR-308, RR-310, RR-313, RR-315, RR-318, RR-319, RR-323, RR-324, RR-326, RR-328, RR-335, RR-350, RR-354, RR-356, RR-358, RR-359, RR-361, RR-364, RR-365, RR-367, RR-368, RR-369, RR-370, RR-374, RR-375, RR-378, RR-381, RR-386, RR-387, RR-389, RR-390, RR-395, RR-400, RR-401, RR-403, RR-403, RR-406, RR-410, RR-411, RR-413, RR-416, RR-418, RR-419, RR-420, RR-421, RR-426, RR-427, RR-428, RR-431, RR-432, RR-434, RR-435, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-447, RR-448, RR-451, RR-452, RR-454, RR-458, RR-461, RR-462, RR-467, RR-468, RR-473, RR-474, RR-487, RR-499, RR-500, RR-504, RR-505, RR-507, RR-508, RR-509, RR-516,	<p>In relation to potential disturbance effects there are also concerns around the influx of workers and how this may affect the accommodation and hospitality sector.</p> <p>Chapter 30 Tourism, Recreation and Socio-Economics (APP-078) section 30.6.1.3 Impact 2: Tourism and Hospitality Sector Employment and section 30.7.2.1.3 Impact 2: Hospitality Employment provide an assessment of the direct effect of increased demand for accommodation for the Project and both Projects cumulatively. The effect of the Projects would be beneficial even in the worst case (i.e. peak demand for worker accommodation during peak tourist season) as it would utilise spare capacity in the accommodation market. There is, however, based upon the latest available figures from EDF Energy, the potential for excess demand if the Applicant's Project and Sizewell C were at peak labour demand during peak tourist season (see Table 30.91 Proportion of Rooms Potentially used if Peak Construction Coincides).</p> <p>The Applicant has committed to carrying out full quantitative CIAs for these topics. The required information to inform this has now been submitted within the Sizewell C New Nuclear Power Station Application. The updated CIA (as appropriate) will be submitted during the Examination of the Project.</p>



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		RR-527, RR-528, RR-529, RR-531, RR-539, RR-540, RR-541, RR-542, RR-544, RR-546, RR-547, RR-552, RR-554, RR-555, RR-560, RR-565, RR-566, RR-567, RR-568, RR-569, RR-577, RR-578, RR-581, RR-589, RR-594, RR-596, RR-598, RR-599, RR-600, RR-604, RR-605, RR-610, RR-613, RR-617, RR-621, RR-622, RR-624, RR-625, RR-627, RR-630, RR-632, RR-633, RR-649, RR-651, RR-652, RR-653, RR-666, RR-667, RR-669, RR-670, RR-674, RR-675, RR-678, RR-682, RR-684, RR-691, RR-692, RR-698, RR-699, RR-702, RR-706, RR-707, RR-708, RR-709, RR-711, RR-719, RR-737, RR-741, RR-742, RR-743, RR-745, RR-747, RR-748, RR-756, RR-757, RR-762, RR-764, RR-773, RR-778, RR-779, RR-786, RR-788, RR-790, RR-797, RR-799, RR-803, RR-809, RR-821, RR-827, RR-832, RR-834, RR-835, RR-837, RR-840, RR-850, RR-853, RR-854, RR-877, RR-878, RR-880, RR-907, RR-911, RR-912, RR-917, RR-923, RR-936, RR-946, RR-810, RR-811, RR-818, RR-819, RR-863, RR-869, RR-882, RR-911, RR-912	
004	Effects on the Suffolk Coast and Heaths Area of Outstanding	RR-019, RR-022, RR-023, RR-045, RR-051, RR-070, RR-071, RR-075, RR-077, RR-088, RR-093, RR-095, RR-100, RR-124, RR-136, RR-138, RR-142, RR-146, RR-173, RR-177, RR-193, RR-195, RR-217, RR-224, RR-225, RR-230, RR-234, RR-244, RR-252, RR-259, RR-260, RR-272, RR-278, RR-279, RR-292, RR-299, RR-305, RR-312, RR-313, RR-319, RR-322, RR-332, RR-336, RR-341, RR-344, RR-364, RR-367, RR-371, RR-388, RR-393, RR-395, RR-396, RR-399, RR-403,	<p>A number of representations highlight concerns with impacts upon the AONB.</p> <p>The major embedded mitigation relating to the AONB was the decision to site permanent operational onshore infrastructure (the onshore substation and National Grid infrastructure) outside the AONB. This ensures that there are no long-term direct impacts upon the AONB. The siting of the onshore substation and National Grid infrastructure at Grove Wood, Friston also means that there are no significant landscape or visual impacts upon the AONB during operation from the onshore infrastructure (see Chapter 29</p>



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No	Topic / Issue	Relevant Representation Number	Applicant's Comments
	natural Beauty (AONB)	RR-409, RR-417, RR-421, RR-428, RR-432, RR-446, RR-447, RR-449, RR-471, RR-475, RR-491, RR-505, RR-507, RR-515, RR-524, RR-539, RR-555, RR-558, RR-559, RR-562, RR-577, RR-578, RR-593, RR-594, RR-605, RR-616, RR-617, RR-625, RR-632, RR-633, RR-648, RR-655, RR-669, RR-684, RR-691, RR-694, RR-706, RR-727, RR-730, RR-734, RR-735, RR-741, RR-743, RR-747, RR-748, RR-749, RR-756, RR-763, RR-778, RR-789, RR-798, RR-801, RR-803, RR-814, RR-827, RR-834, RR-837, RR-841, RR-846, RR-851, RR-857, RR-859, RR-863, RR-868, RR-871, RR-873, RR-877, RR-879, RR-891, RR-892, RR-898, RR-902, RR-907, RR-909, RR-910, RR-911, RR-912, RR-916	<p>Landscape and Visual Impact Assessment (APP-077), section 29.6.2 Potential Effects during Operation). Impacts upon the AONB itself are therefore limited to the construction phase impacts from the onshore cable route within the AONB (i.e. from the landfall up to the Aldeburgh Road crossing).</p> <p>Other impacts would come from several sources:</p> <p>Firstly, there will be direct impacts from construction (e.g. physical disturbance – air quality, noise, ecology etc). These are assessed in the relevant chapters for the onshore development area (i.e. Chapters 18 – Chapter 26 (APP-066 – APP-074), Chapter 29 Landscape and Visual Impact Assessment covers the construction phase impacts, Chapter 30 Tourism, Recreation and Socio-Economics (APP-078) covers impacts to PRow). Direct impacts all have mitigation proposed where required. The reinstatement of the land and landscape elements at the end of the construction period would make the effects temporary. Full details of proposed mitigation for the Project can be found in the following documents: Outline Public Rights of Way Strategy (APP-581), Outline Code of Construction Practice (APP-578) and the Outline Landscape and Ecological Management Strategy (APP-584). These documents provide the basis for the mitigation which will be set out in final documents which must be approved by the Local Planning Authority before onshore works can commence.</p> <p>Secondly, there will be impacts from seascape and landscape effects upon the AONB from offshore construction and offshore operational infrastructure. Some significant visual impacts on the offshore seascape will occur during construction and operation of the Project within sections of the AONB (see Chapter 28 - Offshore Seascape, Landscape and Visual Amenity (APP-076)). The EIA concludes that the construction and operation of the offshore infrastructure will have a relatively low change to</p>



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			the strong overall character of the AONB and will not result in harm to the special qualities of the AONB in overall terms, with the varied and distinctive landscapes of the AONB continuing to define its fundamental character. In terms of how this translates into visitor perception, the EIA concludes that the presence of offshore infrastructure would not be a deterrent to visitors (see section 30.6.2.2). This conclusion is supported to some extent by the DMO Report which suggests that the key issue for potential visitors is construction. It is not reported by the DMO if any respondents raised issues specifically with offshore infrastructure.
005	Use of the "DMO report" (<i>The Energy Coast Implications, impact & opportunities for tourism on the Suffolk Coast</i>)	RR-021, RR-025, RR-042, RR-095, RR-096, RR-098, RR-113, RR-120, RR-131, RR-136, RR-137, RR-173, RR-188, RR-208, RR-223, RR-224, RR-240, RR-250, RR-261, RR-263, RR-267, RR-268, RR-295, RR-298, RR-308, RR-312, RR-326, RR-353, RR-357, RR-358, RR-359, RR-378, RR-381, RR-421, RR-426, RR-427, RR-434, RR-435, RR-437, RR-439, RR-440, RR-441, RR-453, RR-465, RR-467, RR-468, RR-531, RR-542, RR-544, RR-546, RR-554, RR-574, RR-577, RR-585, RR-610, RR-645, RR-649, RR-652, RR-653, RR-684, RR-691, RR-692, RR-699, RR-706, RR-708, RR-709, RR-715, RR-721, RR-745, RR-798, RR-801, RR-802, RR-803, RR-827, RR-851, RR-864, RR-865, RR-842, RR-866, RR-874, RR-876, RR-879, RR-902.	<p>A number of responses highlight that the DMO Report was not considered within the assessment or that the Applicant did not conduct a similar study. The DMO report was published in late September 2019, after the EIA for the Project had been signed off and was in the process of final review. Therefore, it was not practicable to include the DMO Report findings in the EIA.</p> <p>The Applicant has been in consultation with The Suffolk Coast DMO since early 2018 (see Consultation Report, Table 4.7 (APP-029)). In the opinion of the Applicant given that the DMO was undertaking this research already, undertaking their own similar study would either be repetitive or considered to be biased. The Applicant had hoped to include the findings of the DMO report within the EIA if available within the timescales of the assessment.</p> <p>The Applicant considers that the report supports some of the conclusions of the EIA. It is worth noting that although the study tried to disentangle Projects from the Sizewell C development (SZC) (in terms of respondent's knowledge of the different projects), the headline results on monetary impact are based on the cumulative position and not the Projects alone. There is no attempt to assess the impact of the Applicant's projects without</p>



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			<p>SZC. The DMO Report cannot be used to support any conclusions with regard to the Project.</p> <p>The Applicant does not endorse the estimated figure of monetary losses to the tourism industry set out in the DMO Report although the EIA does conclude that there are potential for significant cumulative impacts with SZC. These were not quantified due to the absence of final details from EDF Energy on their proposals.</p> <p>The relevant points from the DMO Report for the Project are:</p> <ul style="list-style-type: none"> • The two main reasons reported for visiting the Suffolk Coast were: for its undisrupted natural beauty and its beaches. The most popular reason as to why respondents would not consider the Suffolk Coast is because there are "<i>other places I would rather visit</i>" (page 34). Less than half of those surveyed are aware of "<i>what there is to see and do on the Suffolk coast</i>" (page 32). This highlights the competitiveness of the UK tourism market and that potential visitors do not know what Suffolk Coast has to offer. • The main concerns voiced with regard to the SZC and SPR projects were disruption to the natural beauty of the area, and traffic and congestion; notably most participants travelling to the Suffolk Coast by car (79-97%). The main concerns voiced by visitors and businesses were similar - loss of tranquillity, traffic congestion, loss of AONB, damage to habitats and road obstructions. All of these concerns are impacts assessed within the Project EIA. • Construction and construction traffic were key concerns related to energy development, there were no reported concerns regarding operation effects (onshore or offshore). Again, this supports the assumption within the EIA on long term effects.



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			<ul style="list-style-type: none"> When visitors were asked about the developments, half of regional market (51%) unaware of EDF plans for SZC whilst two-thirds (65%) were unaware of SPR's plans. Only a small number (7% for EDF / 5% for SPR) knew a lot about the plans. This is reflected in the EIA which highlights that 'iconic projects' (such as SZC) are more likely to cause concern Once all participants were briefed to the same level about the developments, 64% of individuals stated that they would act as a deterrent, despite this 58% stated that they would be no less or even more likely to visit the Suffolk Coast. This contradiction between stated behaviour and actual intention was noted in the literature review undertaken for the Project (see Appendix 30.2 (APP-571))



2.31 Traffic and Transport

Table 31 Applicant's Comments on Traffic and Transport

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General	RR-018, RR-019, RR-020, RR-021, RR-022, RR-023, RR-025, RR-028, RR-040, RR-042, RR-043, RR-049, RR-050, RR-051, RR-068, RR-069, RR-072, RR-074, RR-075, RR-076, RR-087, RR-094, RR-095, RR-096, RR-097, RR-098, RR-099, RR-100, RR-102, RR-105, RR-106, RR-108, RR-112, RR-113, RR-114, RR-116, RR-117, RR-119, RR-123, RR-125, RR-127, RR-129, RR-131, RR-132, RR-133, RR-134, RR-135, RR-136, RR-137, RR-139, RR-140, RR-141, RR-143, RR-144, RR-145, RR-147, RR-148, RR-149, RR-150, RR-151, RR-071, RR-155, RR-156, RR-158, RR-159, RR-161, RR-163, RR-165, RR-166, RR-167, RR-170, RR-171, RR-173, RR-174, RR-178, RR-182, RR-184, RR-185, RR-186, RR-187, RR-188, RR-189, RR-190, RR-193, RR-194, RR-195, RR-196, RR-197, RR-198, RR-199, RR-200, RR-202, RR-203, RR-204, RR-206, RR-207, RR-208, RR-209, RR-211, RR-214, RR-215, RR-216, RR-217, RR-220, RR-221, RR-222, RR-223, RR-224, RR-226, RR-227, RR-228, RR-229, RR-231, RR-233, RR-236, RR-238, RR-239, RR-240, RR-242, RR-243, RR-244, RR-245, RR-246, RR-247, RR-250, RR-251, RR-252, RR-253, RR-254, RR-257, RR-261, RR-262, RR-263, RR-265, RR-266, RR-268, RR-269, RR-270, RR-271, RR-272, RR-274, RR-277, RR-280, RR-283, RR-284, RR-285, RR-289, RR-290, RR-291, RR-292, RR-293, RR-295, RR-296, RR-298, RR-299, RR-300, RR-302, RR-305, RR-308, RR-309, RR-310, RR-312, RR-314, RR-315, RR-317, RR-318, RR-319, RR-322, RR-323, RR-324, RR-325, RR-326, RR-327, RR-328, RR-330, RR-331, RR-332, RR-335, RR-337, RR-338, RR-339, RR-340,	<p>The Applicant notes queries raised in Relevant Representations regarding general traffic and transport concerns.</p> <p>Chapter 26 - Traffic and Transport (APP-074) provides an assessment of the traffic and transport effects of the Project. In addition, Appendices 26.1 – 26.26 (APP-527 - APP-552) provide further information on detailed aspects of this assessment.</p> <p>Pre-application technical engagement was undertaken via the Traffic and Transport Expert Topic Group (ETG), described within Chapter 5 EIA Methodology (APP-054). Meetings were held in April 2018, May 2018, July 2018, September 2018, January 2019 and May 2019. The Traffic and Transport ETG stakeholder membership comprised the relevant technical leads from East Suffolk Council (ESC), Suffolk County Council (SCC) and Highways England (HE). The ETG discussed the methodology for the assessment and the assumptions within it. The Guidelines for the Environmental Assessment of Road Traffic (GEART) are the UK recognised guidelines for the assessment of the environmental impacts of road traffic associated with new developments and these were used in the Environmental Impact Assessment (EIA).</p> <p>The assessment covered the following impacts:</p> <ul style="list-style-type: none"> • Impact 1 – Pedestrian Amenity • Impact 2 – Severance



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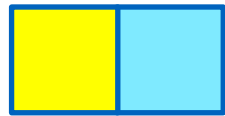
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		RR-343, RR-344, RR-348, RR-349, RR-350, RR-353, RR-355, RR-354, RR-357, RR-358, RR-359, RR-360, RR-361, RR-362, RR-364, RR-365, RR-366, RR-367, RR-368, RR-369, RR-370, RR-373, RR-374, RR-375, RR-378, RR-381, RR-382, RR-383, RR-385, RR-386, RR-387, RR-388, RR-395, RR-396, RR-397, RR-398, RR-400, RR-401, RR-403, RR-404, RR-405, RR-406, RR-407, RR-408, RR-410, RR-413, RR-416, RR-418, RR-419, RR-420, RR-421, RR-426, RR-427, RR-428, RR-429, RR-430, RR-431, RR-432, RR-433, RR-434, RR-435, RR-436, RR-437, RR-439, RR-440, RR-441, RR-442, RR-443, RR-445, RR-446, RR-447, RR-448, RR-449, RR-452, RR-453, RR-454, RR-456, RR-457, RR-458, RR-459, RR-460, RR-461, RR-462, RR-463, RR-464, RR-465, RR-467, RR-468, RR-471, RR-472, RR-473, RR-474, RR-476, RR-477, RR-478, RR-480, RR-481, RR-485, RR-487, RR-488, RR-489, RR-494, RR-495, RR-496, RR-497, RR-498, RR-499, RR-500, RR-502, RR-503, RR-505, RR-507, RR-508, RR-509, RR-516, RR-521, RR-523, RR-526, RR-528, RR-529, RR-530, RR-531, RR-534, RR-535, RR-536, RR-537, RR-539, RR-542, RR-542, RR-543, RR-544, RR-545, RR-546, RR-547, RR-552, RR-553, RR-555, RR-557, RR-558, RR-559, RR-560, RR-565, RR-566, RR-567, RR-568, RR-569, RR-571, RR-574, RR-575, RR-576, RR-577, RR-578, RR-580, RR-582, RR-585, RR-586, RR-587, RR-588, RR-589, RR-591, RR-592, RR-593, RR-595, RR-596, RR-597, RR-598, RR-599, RR-600, RR-601, RR-604, RR-605, RR-607, RR-609, RR-610, RR-611, RR-612, RR-614, RR-615, RR-617, RR-618, RR-619, RR-621, RR-622, RR-624, RR-625, RR-626, RR-627, RR-628, RR-629, RR-630, RR-631, RR-632, RR-633, RR-634, RR-637, RR-638, RR-639, RR-640, RR-641, RR-644, RR-645, RR-647, RR-649, RR-649, RR-650, RR-651, RR-652, RR-653, RR-654, RR-655,	<ul style="list-style-type: none"> • Impact 3 – Road Safety • Impact 4 – Driver Delay (capacity) • Impact 5 – Driver Delay (highway geometry) <p>Chapter 26 - Traffic and Transport Table 26.23 illustrates the highway sections (links) which were screened in for a detailed assessment.</p> <p>Traffic and Transport was a key issue for stakeholders as reflected in Chapter 26 - Traffic and Transport Table 26.1 which summarises the pre-application public consultation feedback received either at public events or in writing.</p>

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		RR-657, RR-661, RR-662, RR-663, RR-664, RR-665, RR-666, RR-667, RR-669, RR-670, RR-674, RR-677, RR-680, RR-682, RR-684, RR-685, RR-686, RR-687, RR-691, RR-692, RR-693, RR-695, RR-696, RR-697, RR-698, RR-699, RR-701, RR-702, RR-703, RR-704, RR-706, RR-707, RR-708, RR-711, RR-713, RR-714, RR-715, RR-716, RR-718, RR-719, RR-720, RR-721, RR-723, RR-726, RR-727, RR-728, RR-730, RR-736, RR-739, RR-741, RR-743, RR-745, RR-746, RR-747, RR-748, RR-750, RR-751, RR-753, RR-754, RR-755, RR-756, RR-757, RR-759, RR-760, RR-761, RR-762, RR-764, RR-765, RR-766, RR-767, RR-768, RR-770, RR-772, RR-773, RR-775, RR-776, RR-778, RR-779, RR-782, RR-783, RR-784, RR-785, RR-786, RR-787, RR-788, RR-789, RR-790, RR-793, RR-794, RR-795, RR-798, RR-799, RR-801, RR-802, RR-803, RR-805, RR-809, RR-811, RR-812, RR-813, RR-814, RR-815, RR-816, RR-818, RR-819, RR-821, RR-823, RR-824, RR-827, RR-828, RR-829, RR-830, RR-831, RR-832, RR-833, RR-834, RR-836, RR-837, RR-839, RR-840, RR-843, RR-847, RR-849, RR-850, RR-851, RR-852, RR-855, RR-856, RR-859, RR-861, RR-863, RR-864, RR-865, RR-866, RR-867, RR-868, RR-870, RR-871, RR-873, RR-874, RR-876, RR-877, RR-878, RR-879, RR-880, RR-881, RR-882, RR-885, RR-887, RR-888, RR-889, RR-890, RR-893, RR-901, RR-902, RR-903, RR-905, RR-907, RR-908, RR-909, RR-911, RR-912, RR-913, RR-916, RR-917, RR-918, RR-919,	
002	Vehicles per day	RR-049, RR-318, RR-592, RR-707, RR-720, RR-908, RR-909,	Representations were received quoting many different headline figures for total numbers of vehicles per day. This response clarifies the proposed projects' forecast vehicle movements that have informed the assessments.



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			<p>Vehicle movements are stated as two way (i.e. two-way movements represent the inbound and outbound trip i.e. 100 two-way movements equate to 50 arrivals and 50 departures). Daily traffic peaks, profiled by month, are summarised for the Project in Chapter 26 - Traffic and Transport Table 26.20 & 26.21 (APP-074) and for the Projects in Appendix 26.2 Table A26.1 & 26.2 (APP-528) The peaks are generated by assuming worst case of full overlap of the peak period for all discrete components of the onshore infrastructure combined, namely: Landfall location; four onshore cable route sections; National Grid Infrastructure; and Onshore Substation.</p> <p>For the Project, the peak Heavy Goods Vehicle (HGV) movements are 210 per day (i.e. 105 vehicles in and 105 vehicles out) in month 34.</p> <p>The peak Light Commercial Vehicle (LCV) movements are 362 per day (i.e. 181 vehicles in and 181 vehicles out) in month 14.</p> <p>The worst case for cumulative construction of both Projects would be simultaneous construction, peak numbers are provided in Appendix 26.2 (APP-528).</p> <p>The peak Heavy Goods vehicle (HGV) movements are 270 per day (i.e. 135 vehicles in and 135 vehicles out) in month 34.</p> <p>The peak Light Commercial Vehicle (LCV) movements are 476 per day (i.e. 238 vehicles in and 238 vehicles out) in month 16.</p> <p>The Applicant notes that the peak HGV movements assessed are discrete peaks and these numbers are not representative of the 'normal' daily traffic peaks summarised for the Project in Chapter 26 - Traffic and Transport Table 26.20 (APP-074) and for the</p>



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			Projects in Appendix 26.2 Table A26.1 (APP-528). The numbers above are specifically from Month 34. The lowest daily HGV movements for the Project, by month, is 22 per day in Months 26 and 27 (and 24 per day in Months 26 and 27 for the Projects during simultaneous construction).
003	Highway geometry & suitability of road network	RR-019, RR-023, RR-025, RR-040, RR-042, RR-043, RR-049, RR-050, RR-069, RR-072, RR-095, RR-096, RR-098, RR-099, RR-100, RR-102, RR-105, RR-106, RR-113, RR-116, RR-117, RR-119, RR-125, RR-136, RR-137, RR-139, RR-141, RR-143, RR-144, RR-145, RR-148, RR-149, RR-150, RR-151, RR-155, RR-158, RR-159, RR-161, RR-163, RR-165, RR-166, RR-167, RR-170, RR-173, RR-185, RR-186, RR-187, RR-188, RR-189, RR-190, RR-195, RR-197, RR-198, RR-202, RR-208, RR-209, RR-221, RR-238, RR-239, RR-242, RR-244, RR-247, RR-252, RR-257, RR-262, RR-266, RR-269, RR-270, RR-272, RR-274, RR-277, RR-285, RR-289, RR-291, RR-292, RR-295, RR-296, RR-298, RR-299, RR-300, RR-305, RR-308, RR-312, RR-315, RR-317, RR-318, RR-319, RR-322, RR-326, RR-335, RR-337, RR-338, RR-343, RR-344, RR-349, RR-350, RR-354, RR-357, RR-358, RR-359, RR-360, RR-361, RR-362, RR-364, RR-365, RR-367, RR-368, RR-369, RR-370, RR-375, RR-378, RR-383, RR-385, RR-395, RR-396, RR-400, RR-403, RR-405, RR-406, RR-410, RR-418, RR-426, RR-427, RR-429, RR-433, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-452, RR-454, RR-457, RR-458, RR-461, RR-463, RR-464, RR-467, RR-468, RR-472, RR-474, RR-476, RR-477, RR-478, RR-480, RR-487, RR-496, RR-497, RR-499, RR-500, RR-503, RR-505, RR-507, RR-509, RR-516, RR-528, RR-529, RR-530, RR-531, RR-535, RR-539, RR-546, RR-547, RR-553, RR-555, RR-557, RR-558,	<p>Responses suggest that there are issues with the highway network and that the network is generally unsuitable for the HGV usage. The Applicant has undertaken a detailed review of the highway network to determine the probable routes for traffic, during both construction and operational phases of the proposed projects. The review identified routes that would be unsuitable for HGV traffic (due to constrained highway geometry, weight restrictions/weak structures or the potential for adverse impact on sensitive communities). Chapter 26 - Traffic and Transport Table 26.4 (APP-074) contains the Applicant's commitment to assign HGVs away from unsuitable routes. This commitment is detailed within the Outline Construction Traffic Management Plan (OCTMP) (APP-586) and will be included within the final Construction Traffic Management Plan secured under the requirements of the draft DCO (APP-023).</p> <p>The extent of the onshore highway study area has been agreed with Suffolk County Council and Highways England through the consultation process. Routes that extend outside of the onshore highway study area are routes where construction traffic has dissipated and / or include roads with negligible sensitive receptors. When combined these parameters do not represent significant impacts on the highway network.</p>



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		RR-559, RR-569, RR-571, RR-574, RR-575, RR-576, RR-577, RR-578, RR-580, RR-582, RR-587, RR-588, RR-589, RR-599, RR-601, RR-605, RR-607, RR-609, RR-610, RR-614, RR-615, RR-617, RR-618, RR-619, RR-622, RR-624, RR-625, RR-626, RR-630, RR-634, RR-639, RR-641, RR-644, RR-649, RR-650, RR-652, RR-653, RR-655, RR-657, RR-664, RR-666, RR-669, RR-670, RR-677, RR-682, RR-684, RR-685, RR-687, RR-691, RR-696, RR-697, RR-702, RR-703, RR-704, RR-705, RR-707, RR-708, RR-709, RR-711, RR-719, RR-723, RR-721, RR-727, RR-728, RR-753, RR-755, RR-756, RR-764, RR-768, RR-776, RR-778, RR-787, RR-789, RR-790, RR-805, RR-816, RR-821, RR-832, RR-835, RR-837, RR-843, RR-848, RR-851, RR-855, RR-856, RR-887, RR-892, RR-893, RR-895, RR-907, RR-911, RR-912, RR-913, RR-914, RR-919.	<p>During technical consultation, only two locations within the agreed study area were identified as posing a potential geometric constraint to HGVs (i.e. HGVs would not be able to pass in opposing directions) These locations are subject to assessment in Chapter 26 - Traffic and Transport section 26.6.1.12 (APP-074), and shown on Figure 26.7 (APP-312) and are described below.</p> <ul style="list-style-type: none"> Major / Minor priority junction of the A1094 and B1069 <ul style="list-style-type: none"> Results from the swept path analysis show that for the A1094/B1069 junction all likely manoeuvres can be completed by all vehicle types and therefore the impact is assessed as negligible (see Appendix 26.21 (APP-547)) Roundabout junction of the A1094 and B1122 'Tesco Roundabout'. <ul style="list-style-type: none"> The swept path analysis for the junction of the A1094 and B1122 demonstrates that an articulated HGV travelling from A1094 to the B1122 would swing out into the oncoming lane (see Appendix 26.21 (APP-547)) It is considered that the potential for delays associated with such a manoeuvre would therefore be infrequent (less than 1 per hour) and are therefore assessed as of a low magnitude of effect upon a highly sensitive receptor resulting in a moderate adverse impact. Therefore, additional mitigation is required such as:



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			<ul style="list-style-type: none"> ▪ All construction traffic associated with the works either side of the B1122 would first travel to the construction consolidation site at the B1069, from here the vehicles would then travel onwards to B1122. This strategy would allow most deliveries to be consolidated on to appropriately sized vehicles. ▪ Should there be a requirement for a larger articulated vehicle to access direct at access 5 or 6, then it is proposed that the vehicle would be escorted by a pilot vehicle to hold back oncoming traffic to enable a safe manoeuvre to be undertaken. This strategy would be included within the controls and measures in the Construction Traffic Management Plan which will be in accordance with the OCTMP (APP-586) and secured under the requirements of the draft DCO (APP-023) ○ Following the implementation of the additional measures to mitigate the potential impacts of articulated vehicles turning from the A1094 to B1122 the magnitude is assessed as negligible on a receptor of high sensitivity resulting in a minor adverse residual impact. <p>In addition, the Applicant has determined the suitable routes for the transportation of Abnormal Indivisible Loads (Large loads that cannot be delivered on standard HGVs). The following documents</p>



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			<p>are relevant to highway geometry assessments for Abnormal Indivisible Loads:</p> <ul style="list-style-type: none"> • Appendix 26.3 - Abnormal Indivisible Load Access to the Proposed East Anglia TWO and Proposed East Anglia ONE North Offshore Windfarm Substation (APP-529); • Appendix 26.4 - Swept Path Assessment of Known Pinch Point on Heavy Load Route (APP-530); and • Appendix 26.5 - A1094- B1069 Widening for Abnormal Indivisible Load (APP-531).
004	Traffic through Friston, Leiston, Coldfair Green, Knodishall, Sternfield, Benhall Green	RR-018, RR-019, RR-020, RR-021, RR-022, RR-023, RR-025, RR-040, RR-042, RR-043, RR-050, RR-068, RR-069, RR-075, RR-087, RR-096, RR-098, RR-099, RR-100, RR-102, RR-105, RR-106, RR-108, RR-113, RR-114, RR-116, RR-117, RR-125, RR-129, RR-132, RR-136, RR-137, RR-173, RR-139, RR-141, RR-143, RR-144, RR-148, RR-149, RR-151, RR-155, RR-158, RR-159, RR-161, RR-163, RR-165, RR-166, RR-167, RR-171, RR-178, RR-185, RR-186, RR-187, RR-188, RR-189, RR-193, RR-194, RR-195, RR-196, RR-197, RR-199, RR-200, RR-202, RR-204, RR-206, RR-208, RR-209, RR-211, RR-216, RR-220, RR-222, RR-223, RR-224, RR-226, RR-229, RR-231, RR-236, RR-238, RR-239, RR-240, RR-242, RR-243, RR-244, RR-245, RR-246, RR-247, RR-257, RR-262, RR-263, RR-266, RR-268, RR-270, RR-272, RR-274, RR-280, RR-283, RR-284, RR-289, RR-290, RR-291, RR-292, RR-295, RR-296, RR-298, RR-299, RR-300, RR-302, RR-308, RR-309, RR-310, RR-312, RR-314, RR-315, RR-317, RR-318, RR-319, RR-322, RR-323, RR-324, RR-325, RR-326, RR-327, RR-328, RR-330, RR-331, RR-335,	<p>The Applicant notes queries raised in Relevant Representations regarding traffic through Friston, Leiston, Coldfair Green, Knodishall, Sternfield, Benhall Green.</p> <p>Chapter 26 - Traffic and Transport Table 26.4 covers embedded mitigation on routeing.</p> <p>The strategy for access applies a hierarchical approach (informed by the SCC HGV route hierarchy) to selecting routes and where possible, seeks to reduce the impact of HGV traffic upon the most sensitive communities. The access strategy includes the following commitments:</p> <ul style="list-style-type: none"> • All HGV construction traffic would be required to travel via the A1094 or B1122 from the A12, no HGV traffic would be permitted to travel via alternative routes, such as the B1121 or B1119. • No HGV construction traffic would be permitted to travel via Leiston or Coldfair Green / Knodishall.

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		RR-337, RR-338, RR-340, RR-343, RR-349, RR-350, RR-353, RR-354, RR-358, RR-359, RR-360, RR-364, RR-365, RR-368, RR-369, RR-370, RR-373, RR-374, RR-375, RR-378, RR-381, RR-383, RR-385, RR-387, RR-388, RR-395, RR-396, RR-400, RR-403, RR-408, RR-410, RR-416, RR-420, RR-426, RR-427, RR-428, RR-433, RR-436, RR-437, RR-439, RR-441, RR-442, RR-445, RR-446, RR-447, RR-448, RR-449, RR-456, RR-457, RR-458, RR-464, RR-467, RR-468, RR-471, RR-495, RR-496, RR-497, RR-499, RR-505, RR-507, RR-509, RR-526, RR-531, RR-536, RR-543, RR-545, RR-546, RR-547, RR-560, RR-566, RR-569, RR-588, RR-589, RR-592, RR-604, RR-605, RR-611, RR-612, RR-617, RR-622, RR-626, RR-627, RR-630, RR-631, RR-634, RR-637, RR-639, RR-640, RR-649, RR-650, RR-651, RR-652, RR-653, RR-654, RR-655, RR-662, RR-666, RR-674, RR-677, RR-684, RR-691, RR-693, RR-703, RR-704, RR-706, RR-708, RR-711, RR-720, RR-721, RR-726, RR-736, RR-741, RR-746, RR-747, RR-754, RR-756, RR-761, RR-762, RR-764, RR-765, RR-770, RR-772, RR-773, RR-775, RR-776, RR-781, RR-789, RR-790, RR-794, RR-805, RR-816, RR-818, RR-819, RR-821, RR-828, RR-829, RR-831, RR-833, RR-834, RR-835, RR-851, RR-856, RR-873, RR-875, RR-877, RR-881, RR-882, RR-885, RR-887, RR-888, RR-893, RR-901, RR-905, RR-907, RR-908, RR-909, RR-911, RR-912, RR-913, RR-919,	<ul style="list-style-type: none"> No HGV construction traffic would be permitted to travel via the B1121 through Friston, Sternfield or Benhall-Green. No HGV construction traffic would be permitted to travel via the B1353 towards Thorpeness. To avoid the requirement for HGVs to travel via the B1122 from B1353 towards Thorpeness, all HGV construction traffic for the landfall would access the landfall location via Sizewell Gap. Vehicles would then travel south on a temporary haul road to the landfall location. All HGV traffic to the onshore substation and National Grid Substation to avoid travelling via Friston or Sternfield by accessing from the B1069 (south of Knodishall/ Coldfair Green) and travelling along a temporary haul road and crossing over Grove Road. <p>These commitments are secured in the OCTMP (APP-586). Section 4 of the OCTMP covers the provisions for Monitoring and Enforcement. The final CTMP will be produced post-consent, prior to commencement of the onshore construction of the proposed project and will be in line with the OCTMP (as required by the draft DCO (APP-023)). Once contractors have been appointed, the final CTMP measures would be approved by East Suffolk Council (as the relevant local planning authority) in consultation with Suffolk County Council (as the local highway authority) and agreed prior to the commencement of onshore works.</p>
005	'Tesco Roundabout'	RR-020, RR-021, RR-022, RR-023, RR-134, RR-211, RR-216, RR-300, RR-344, RR-350, RR-361, RR-362, RR-369, RR-370,	The Applicant notes queries raised in Relevant Representations regarding traffic associated with the 'Tesco Roundabout'.



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	(B1094 & B1122)	RR-387, RR-388, RR-395, RR-405, RR-406, RR-410, RR-443, RR-445, RR-446, RR-452, RR-473, RR-480, RR-487, RR-516, RR-553, RR-569, RR-609, RR-624, RR-649, RR-655, RR-657, RR-677, RR-691, RR-707, RR-821, RR-832, RR-851, RR-907, RR-919,	<p>Chapter 26 - Traffic and Transport section 26.6.1.12.2 covers this point</p> <p>All HGV traffic travelling via the A1094 and B1122 roundabout would be associated with vehicles travelling to access 5 and 6 to undertake works to a small part of section 3 (section 3b) of the onshore cable route that is located either side of the B1122 to the south of Aldringham (see Figure 26.2 - Access Locations and Associated Onshore Infrastructure (APP-307)).</p> <p>All construction traffic associated with the works either side of the B1122 would first travel to the construction consolidation site at the B1069, from here the vehicles would then travel onwards to B1122. This strategy would allow most deliveries to be consolidated on to appropriately sized vehicles.</p> <p>However, in the unlikely event that there is a specific requirement for larger articulated vehicles to access direct at access 5 or 6, then it is proposed that the vehicle would be escorted by a pilot vehicle to hold back oncoming traffic to enable safe manoeuvring through the roundabout arms.</p> <p>A peak of 10 two-way HGV movements per day will be required during works on this section (see Table A26.3, Link 10 in Appendix 26.2 (APP-528)).</p>
006	Use of Sizewell Gap Road, Nuclear Safety	RR-072, RR-074, RR-141, RR-148, RR-149, RR-165, RR-173, RR-188, RR-203, RR-208, RR-209, RR-223, RR-224, RR-244, RR-263, RR-270, RR-283, RR-295, RR-298, RR-308, RR-322, RR-324, RR-326, RR-353, RR-358, RR-359, RR-364, RR-368, RR-413, RR-427, RR-436, RR-437, RR-439, RR-441, RR-443, RR-447, RR-448, RR-449, RR-476, RR-477, RR-505, RR-531,	<p>The Applicant notes queries raised in Relevant Representations regarding the use of Sizewell Gap Road and nuclear safety.</p> <p>DCO Requirement 33 requires an Emergency Incident Response Plan. Consultation between the Applicant, SCC and the Office for</p>



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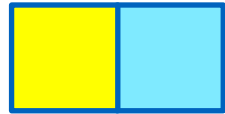
No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-571, RR-574, RR-577, RR-637, RR-652, RR-653, RR-684, RR-706, RR-708, RR-720, RR-721, RR-741, RR-786, RR-787, RR-788, RR-797, RR-798, RR-801, RR-802, RR-803, RR-810, RR-811, RR-816, RR-827, RR-829, RR-851, RR-864, RR-865, RR-866, RR-873, RR-874, RR-876, RR-885, RR-887, RR-902, RR-907	Nuclear Regulation is on-going around the wording for this requirement.
007	Grove Road	RR-069, RR-148, RR-149, RR-231, RR-280, RR-322, RR-350, RR-445, RR-446, RR-595, RR-598, RR-649, RR-805, RR-821, RR-851, RR-908, RR-909	<p>The Applicant notes queries raised in Relevant Representations regarding traffic associated with Grove Road.</p> <p>Grove Road would be crossed by cabling works but is not a permitted route for HGV construction traffic. No vehicles will be allowed to travel along Grove Road to access the onshore cable route or substation locations via the onshore cable corridor haul road from the crossing location of Grove Road.</p>
008	The corner of Lover's Lane and King George's Avenue	RR-023, RR-074, RR-087, RR-283, RR-335, RR-413, RR-537	<p>The Applicant notes queries raised in Relevant Representations regarding traffic associated with the corner of Lover's Lane and King George's Avenue.</p> <p>Chapter 26 - Traffic and Transport (APP-074) provides an assessment of the traffic and transport effects of the Project. In addition, Appendices 26.1 – 26.26 (APP-527 - APP-552) provide further information on detailed aspects of this assessment.</p> <p>The junction referred to is assessed as Sizewell Gap (Link 12) and contains Access 1 and Access 2 to the onshore development area. Link 12 was subject to an assessment in accordance with recognised UK guidelines (GEART) and considered the following impacts:</p> <ul style="list-style-type: none"> Impact 1 – Pedestrian Amenity (section 26.6.1.8.1.7)



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			<ul style="list-style-type: none"> ○ Noting that there are minimal receptors along the link and that pedestrians and cyclists are accommodated off road (i.e. pavement and cycleway), the link is assessed as a low sensitivity. ○ It is considered that a change in background of HGV flows of 132% could result in a medium magnitude of effect on a low sensitivity link resulting in a minor adverse impact. ○ No mitigation further to that embedded within the design of the proposed projects is considered necessary. • Impact 2 – Severance (section 26.6.1.9) <ul style="list-style-type: none"> ○ It can be noted from Table 26.10 that total traffic flows along link 12 (with and without the proposed project's traffic) are significantly below 8,000 vehicles per day where the DMRB suggests severance is unlikely to manifest. The magnitude of effect upon these links is therefore assessed as negligible on low to high sensitivity links giving a maximum impact of negligible to minor adverse. • Impact 3 – Road Safety (section 26.5.4) <ul style="list-style-type: none"> ○ A review of historic data showed this link to be well below the national average for personal injury collisions and therefore this link was not considered further in line with the agreed methodology. ○ The Outline Access Management Plan (OAMP), Annex 1 (APP-587) details UK standard compliant



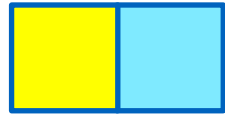
No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<p>access treatment for Access 1 and Access 2 which includes the provision of a 40mph speed limit to promote road safety. The design has been validated by an Independent Road safety Audit which is appended to the OAMP.</p> <ul style="list-style-type: none"> • Impact 4 – Driver Delay (capacity) • The highway locations sensitive to Driver Delay impacts were identified in consultation with Suffolk County Council and Highways England in the context of the Project's traffic demand as detailed in Chapter 26 - Traffic and Transport, Table 26.25 (APP-074). For Link 12, a forecast increase in total traffic of 10% (for EA1N or EA2) and 12% (EA1N and EA2 cumulative) was presented to highway stakeholders and based on this information, the potential impacts were forecast to be insignificant and it was agreed that no further assessment was necessary. Impact 5 – Driver Delay (highway geometry) <ul style="list-style-type: none"> ○ Link 12 is an established haul route for Sizewell B so there are no significant highway geometry Driver Delay impacts. <p>In addition to the traffic impacts of the Project, the Applicant has engaged with EDF Energy to consider the cumulative traffic impacts with the proposed Sizewell C Project. EDF Energy has indicated that it does not propose to route construction traffic via Link 12 and therefore there would be no potential for cumulative impacts with Sizewell C.</p>



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009	Safety and impacts on pedestrians and cyclists	RR-019, RR-021, RR-022, RR-023, RR-025, RR-040, RR-042, RR-043, RR-050, RR-068, RR-069, RR-074, RR-076, RR-096, RR-098, RR-099, RR-100, RR-102, RR-105, RR-112, RR-114, RR-125, RR-134, RR-136, RR-137, RR-148, RR-149, RR-165, RR-166, RR-170, RR-173, RR-188, RR-211, RR-217, RR-221, RR-223, RR-224, RR-226, RR-229, RR-231, RR-240, RR-242, RR-244, RR-263, RR-266, RR-272, RR-277, RR-280, RR-295, RR-298, RR-299, RR-302, RR-308, RR-312, RR-314, RR-318, RR-322, RR-326, RR-335, RR-337, RR-344, RR-350, RR-354, RR-358, RR-359, RR-361, RR-362, RR-364, RR-367, RR-368, RR-369, RR-370, RR-378, RR-383, RR-387, RR-396, RR-398, RR-400, RR-403, RR-405, RR-406, RR-410, RR-427, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-447, RR-448, RR-449, RR-454, RR-461, RR-462, RR-467, RR-468, RR-476, RR-477, RR-478, RR-485, RR-499, RR-503, RR-505, RR-507, RR-508, RR-526, RR-528, RR-546, RR-552, RR-557, RR-558, RR-559, RR-560, RR-566, RR-577, RR-587, RR-591, RR-596, RR-599, RR-605, RR-609, RR-610, RR-619, RR-621, RR-625, RR-626, RR-627, RR-633, RR-639, RR-647, RR-649, RR-652, RR-653, RR-665, RR-666, RR-669, RR-682, RR-684, RR-685, RR-691, RR-696, RR-702, RR-706, RR-708, RR-709, RR-711, RR-715, RR-719, RR-721, RR-727, RR-728, RR-757, RR-760, RR-764, RR-766, RR-770, RR-773, RR-776, RR-778, RR-784, RR-785, RR-786, RR-787, RR-788, RR-793, RR-794, RR-798, RR-799, RR-801, RR-802, RR-805, RR-811, RR-827, RR-832, RR-835, RR-837, RR-840, RR-843, RR-847, RR-851, RR-856, RR-859, RR-864, RR-865, RR-866, RR-873, RR-874, RR-876, RR-879, RR-880, RR-892, RR-893, RR-902, RR-903, RR-907,	<p>The Applicant notes queries raised in Relevant Representations regarding road safety and in particular impacts on pedestrians and cyclists.</p> <p>The Applicant has undertaken a detailed review of the highway network to determine the probable routes for traffic, during both construction and operational phases of the Project. The review identified routes that would be unsuitable for HGV traffic (due to constrained highway geometry, weight restrictions/weak structures or the potential for adverse impact on sensitive communities). Chapter 26 - Traffic and Transport Table 26.4 (APP-074) contains the Applicant's commitment to assign HGVs away from unsuitable routes.</p> <p>A desktop exercise augmented by site visits has been undertaken to identify the sensitive receptors in the onshore highway study area. All 15 links within the onshore highway study area have been assessed and assigned a sensitivity defined by the type of user groups that may use it (e.g. schools, community facilities, public houses, designated walking /cycling routes) and the level of protection afforded to them by the existing highway environment. Note that as Thorpeness Road is not being used there is no pathway for impact upon golfers crossing the road.</p> <p>Chapter 26 - Traffic and Transport, Table 26.13 details base sensitivity of the links, pedestrian and cycle user groups have informed the sensitivity value assigned to each highway link (e.g. for Link 4c it is noted that Regional Cycleway 42 runs along part of the route).</p> <p>It is therefore demonstrable that the sensitivity of the links, and awareness of the user groups is intrinsic in the assessment</p>



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		RR-908, RR-909, RR-911, RR-912, RR-913, RR-914, RR-916, RR-918,	<p>process and has informed the subsequent impact significance outputs and mitigation strategies.</p> <p>Chapter 26 - Traffic and Transport Section 26.6.1.8 Impact 1: Pedestrian Amenity assesses the highway sections (links) deemed sensitive for pedestrians and cyclists. Given the conclusions of the assessment based on consideration of sensitivities, no mitigation for cyclists is required or proposed.</p> <p>As embedded mitigation, a safe route would be maintained for pedestrians through the works area along the B1122.</p> <p>The assessment highlights the requirement for additional mitigation for Link 4b (B1122 at Theberton), Link 6 (the A1094 east from its junction with the A12 to its junction with the B1069 to the east of Friston) (see section 26.6.1.8.2 Additional Mitigation Measures). Such measures include:</p> <ul style="list-style-type: none"> • Extending existing footways: and • Providing pedestrian dropped crossings <p>Road Safety impacts for all user groups are considered <i>in Chapter 26 - Traffic and Transport Section 26.5.4</i> (baseline) and assessed in section 26.6.1.10.</p> <p>In consultation with SCC it was agreed that the road safety assessment would examine the baseline collision data to identify those areas that are potentially sensitive to changes in traffic. The review included:</p> <ul style="list-style-type: none"> • Examining the rate of collisions per length of road in miles (known as collision rates); and



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			<ul style="list-style-type: none"> Reviewing the types of collisions at defined clusters to understand any patterns or trends, especially those involving HGVs and vulnerable road users (namely cyclists, pedestrians and motorcyclists). <p>The subsequent assessment did not identify significant impacts for pedestrians and cyclists, therefore no road safety mitigation specific to those user groups was identified.</p> <p>Several representations also mention safety of horse riders. Horse riders were not specifically mentioned in the Chapter 26 - Traffic and Transport (APP-074). This group was not identified by the assessment as there were no equestrian routes on the highway. However, as discussed above all sensitive highway user groups were assessed and mitigation introduced as appropriate. Some of the mitigation identified would benefit all user groups (including horse riders), e.g. speed reduction.</p>
010	Road safety - accidents	RR-019, RR-021, RR-022, RR-023, RR-025, RR-040, RR-042, RR-043, RR-050, RR-068, RR-069, RR-072, RR-074, RR-076, RR-096, RR-098, RR-099, RR-100, RR-102, RR-105, RR-125, RR-136, RR-137, RR-148, RR-149, RR-165, RR-173, RR-188, RR-195, RR-229, RR-262, RR-263, RR-266, RR-280, RR-295, RR-298, RR-299, RR-302, RR-308, RR-318, RR-326, RR-337, RR-350, RR-354, RR-358, RR-359, RR-361, RR-367, RR-368, RR-369, RR-370, RR-378, RR-387, RR-396, RR-400, RR-403, RR-410, RR-427, RR-437, RR-439, RR-445, RR-446, RR-447, RR-448, RR-449, RR-461, RR-467, RR-468, RR-476, RR-477, RR-487, RR-499, RR-503, RR-505, RR-508, RR-528, RR-546, RR-552, RR-555, RR-557, RR-558, RR-559, RR-560, RR-566, RR-577, RR-587, RR-599, RR-605, RR-609, RR-610, RR-621, RR-622, RR-625, RR-626, RR-627, RR-647, RR-649, RR-651,	<p>The Applicant notes queries raised in Relevant Representations regarding road safety and the potential for increased accidents.</p> <p>Road safety is considered in Chapter 26 - Traffic and Transport Section 26.5.4 and assessed in section 26.6.1.10. Collision clusters have been identified that could potentially be exacerbated by the Project's construction traffic demand. Mitigation has been identified to reduce impacts to non-significant.</p>



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		RR-652, RR-653, RR-669, RR-682, RR-684, RR-691, RR-702, RR-706, RR-708, RR-711, RR-715, RR-721, RR-727, RR-728, RR-736, RR-757, RR-760, RR-764, RR-766, RR-770, RR-778, RR-787, RR-788, RR-793, RR-794, RR-798, RR-801, RR-802, RR-805, RR-811, RR-821, RR-827, RR-837, RR-840, RR-843, RR-847, RR-851, RR-856, RR-859, RR-864, RR-865, RR-866, RR-873, RR-874, RR-876, RR-879, RR-880, RR-902, RR-903, RR-907, RR-911, RR-912, RR-916, RR-918	
011	Restricted Access	RR-018, RR-019, RR-020, RR-021, RR-022, RR-023, RR-025, RR-028, RR-040, RR-042, RR-043, RR-050, RR-068, RR-069, RR-074, RR-075, RR-076, RR-094, RR-096, RR-097, RR-098, RR-099, RR-100, RR-102, RR-105, RR-106, RR-108, RR-112, RR-113, RR-114, RR-116, RR-117, RR-125, RR-129, RR-132, RR-134, RR-135, RR-136, RR-137, RR-139, RR-140, RR-141, RR-143, RR-144, RR-148, RR-149, RR-151, RR-158, RR-159, RR-163, RR-165, RR-166, RR-167, RR-171, RR-173, RR-174, RR-178, RR-182, RR-185, RR-186, RR-187, RR-188, RR-189, RR-193, RR-194, RR-195, RR-196, RR-197, RR-199, RR-200, RR-202, RR-204, RR-206, RR-208, RR-209, RR-211, RR-216, RR-220, RR-222, RR-223, RR-224, RR-226, RR-229, RR-231, RR-238, RR-239, RR-240, RR-242, RR-244, RR-245, RR-246, RR-247, RR-253, RR-257, RR-262, RR-263, RR-266, RR-268, RR-269, RR-270, RR-272, RR-274, RR-280, RR-284, RR-285, RR-289, RR-290, RR-291, RR-292, RR-295, RR-296, RR-298, RR-299, RR-300, RR-302, RR-308, RR-309, RR-310, RR-312, RR-315, RR-317, RR-318, RR-319, RR-323, RR-324, RR-326, RR-327, RR-328, RR-330, RR-331, RR-335, RR-337, RR-338, RR-343, RR-344, RR-348, RR-349, RR-350, RR-353, RR-354, RR-358, RR-359, RR-360, RR-364, RR-368, RR-369, RR-370,	<p>The Applicant notes queries raised in Relevant Representations regarding restricted vehicular access.</p> <p>Free or managed access will be maintained at all time for properties and businesses.</p> <p>There will be temporary roadworks associated with off-site highway works, highway access construction or cable crossings which will require short-term traffic management (e.g. traffic signals, diversions) which will cause minor inconvenience to the travelling public and insignificant driver delays.</p> <p>Chapter 26 - Traffic and Transport Table 26.4 (REP-074) contains the measures to maintain access which are contained in the OCTMP (APP-586). The final CTMP will be produced post-consent, prior to commencement of the onshore construction of the Project and will be in line with the OCTMP (as required by the draft DCO (APP-023)). Once contractors have been appointed, the final CTMP measures would be approved by East Suffolk Council (as the relevant local planning authority) in consultation with Suffolk County Council (as the local highway authority) and agreed prior to the commencement of onshore works. Notification of the traffic management measures will be in accordance with the</p>

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		RR-373, RR-374, RR-378, RR-381, RR-385, RR-387, RR-388, RR-395, RR-396, RR-400, RR-403, RR-404, RR-405, RR-406, RR-408, RR-410, RR-413, RR-416, RR-418, RR-420, RR-421, RR-426, RR-427, RR-428, RR-430, RR-432, RR-433, RR-434, RR-435, RR-436, RR-437, RR-439, RR-441, RR-442, RR-443, RR-445, RR-446, RR-447, RR-448, RR-449, RR-454, RR-458, RR-461, RR-464, RR-467, RR-468, RR-471, RR-473, RR-474, RR-476, RR-477, RR-480, RR-495, RR-496, RR-497, RR-498, RR-499, RR-503, RR-507, RR-508, RR-509, RR-516, RR-528, RR-531, RR-536, RR-539, RR-542, RR-543, RR-544, RR-545, RR-546, RR-547, RR-552, RR-553, RR-555, RR-558, RR-559, RR-560, RR-565, RR-566, RR-569, RR-571, RR-574, RR-577, RR-582, RR-585, RR-588, RR-589, RR-592, RR-599, RR-600, RR-604, RR-605, RR-610, RR-611, RR-612, RR-617, RR-619, RR-621, RR-622, RR-624, RR-625, RR-626, RR-627, RR-631, RR-632, RR-637, RR-639, RR-640, RR-649, RR-650, RR-651, RR-652, RR-653, RR-654, RR-655, RR-657, RR-662, RR-665, RR-666, RR-669, RR-670, RR-674, RR-682, RR-684, RR-691, RR-692, RR-696, RR-706, RR-708, RR-715, RR-720, RR-721, RR-723, RR-726, RR-741, RR-743, RR-745, RR-747, RR-756, RR-761, RR-762, RR-764, RR-765, RR-766, RR-772, RR-778, RR-784, RR-794, RR-798, RR-801, RR-802, RR-805, RR-811, RR-818, RR-819, RR-827, RR-833, RR-837, RR-843, RR-847, RR-850, RR-851, RR-859, RR-861, RR-864, RR-865, RR-866, RR-873, RR-874, RR-876, RR-879, RR-880, RR-881, RR-882, RR-901, RR-902, RR-907, RR-908, RR-909, RR-911, RR-912, RR-916, RR-918	requirements of the New Roads and Street Works Act 1991 ensuring roadworks are co-ordinated to minimise impact.
012	Impact upon emergency	RR-068, RR-069, RR-072, RR-074, RR-102, RR-125, RR-136, RR-137, RR-141, RR-143, RR-148, RR-149, RR-165, RR-166,	The Applicant notes queries raised in Relevant Representations regarding the impact upon emergency services (driver delay).



No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
	services (driver delay)	RR-173, RR-187, RR-188, RR-195, RR-209, RR-223, RR-224, RR-239, RR-244, RR-250, RR-254, RR-261, RR-263, RR-268, RR-295, RR-298, RR-308, RR-309, RR-315, RR-317, RR-326, RR-337, RR-343, RR-354, RR-358, RR-359, RR-364, RR-368, RR-369, RR-370, RR-378, RR-381, RR-396, RR-400, RR-403, RR-410, RR-427, RR-434, RR-435, RR-436, RR-437, RR-439, RR-441, RR-443, RR-445, RR-446, RR-453, RR-454, RR-505, RR-529, RR-531, RR-546, RR-547, RR-552, RR-555, RR-559, RR-571, RR-575, RR-576, RR-577, RR-582, RR-587, RR-599, RR-605, RR-610, RR-634, RR-637, RR-649, RR-652, RR-653, RR-682, RR-684, RR-692, RR-706, RR-708, RR-709, RR-715, RR-721, RR-739, RR-743, RR-764, RR-776, RR-787, RR-798, RR-801, RR-802, RR-803, RR-805, RR-810, RR-811, RR-827, RR-829, RR-837, RR-851, RR-864, RR-865, RR-866, RR-873, RR-874, RR-876, RR-892, RR-902, RR-907, RR-916, RR-917, RR-918,	<p>Chapter 26 - Traffic and Transport Section 26.6. 1.11 and section 26.6.1.12 assess impacts relating to congestion. This assessment determines that the operation and functionality of the highway network is not significantly impacted by the Project's traffic and therefore it is implicit that there is not an impact on emergency service response times.</p> <p>To support the functionality of the highway network, embedded mitigation measures are identified to limit Driver Delay impacts to not significant as follows:</p> <ul style="list-style-type: none"> • A cable corridor haul route that reduces HGV movements on the public highway; • A booking system to enable a daily profile of deliveries to be maintained and ensure that the required deliveries are regularly forecast and planned; • Worker generated traffic reduced through car sharing; and • No roads to be fully closed to install the Project's cables under the public highway. <p>In addition, the Outline Construction Traffic Management Plan, Section 2.2.7(APP-586) contains a 'Network Resilience' strategy to reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during planned and unplanned events. Table 2.2 sets out the measures to mitigate the impact of construction traffic on the following events:</p> <ul style="list-style-type: none"> • Sizewell B outages; • Major events on the highway (e.g. bike races, parades, etc) and public holidays;



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			<ul style="list-style-type: none"> Major incidents such as accidents on the highway; and Incidents involving contractors, such as, breakdowns, accidents, etc. <p>This embedded mitigation is secured by the Outline Construction Traffic Management Plan (APP-586) and the Outline Travel Plan (APP-588). The final detailed CTMP and Travel Plan (TP) will be produced post-consent, prior to commencement of the onshore construction of the Project, and will be in line with the OCTMP (APP-586) and OTP (APP-588) (as required by the draft DCO (APP-023)). Once contractors have been appointed, the final CTMP and TP measures would be further developed in consultation with Suffolk County Council (as the local highway authority) and agreed with East Suffolk Council (as the relevant local planning authority), prior to the commencement of onshore works.</p>
013	Traffic congestion (driver delay)	RR-018, RR-019, RR-020, RR-021, RR-022, RR-023, RR-025, RR-028, RR-040, RR-042, RR-043, RR-050, RR-068, RR-069, RR-072, RR-074, RR-075, RR-076, RR-095, RR-096, RR-098, RR-099, RR-100, RR-102, RR-105, RR-113, RR-114, RR-116, RR-117, RR-125, RR-129, RR-132, RR-133, RR-134, RR-136, RR-137, RR-139, RR-141, RR-143, RR-144, RR-145, RR-148, RR-149, RR-151, RR-158, RR-159, RR-163, RR-165, RR-166, RR-167, RR-173, RR-178, RR-185, RR-186, RR-188, RR-189, RR-193, RR-194, RR-196, RR-198, RR-199, RR-200, RR-202, RR-204, RR-206, RR-208, RR-209, RR-211, RR-216, RR-220, RR-222, RR-223, RR-224, RR-226, RR-229, RR-231, RR-236, RR-238, RR-239, RR-240, RR-242, RR-244, RR-245, RR-246, RR-247, RR-251, RR-253, RR-257, RR-262, RR-263, RR-269,	<p>The Applicant notes queries raised in Relevant Representations regarding traffic congestion and associated driver delay.</p> <p>Chapter 26 - Traffic and Transport Section 26.6. 1.11 and section 26.6. 1.12 assess impacts relating to congestion. Embedded mitigation measures are identified to limit Driver Delay impacts to not significant as follows:</p> <ul style="list-style-type: none"> A cable corridor haul route that reduces HGV movements on the public highway; A booking system to enable a daily profile of deliveries to be maintained and ensure that the required deliveries are regularly forecast and planned; and



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		RR-270, RR-272, RR-274, RR-283, RR-284, RR-289, RR-290, RR-291, RR-292, RR-295, RR-296, RR-298, RR-299, RR-300, RR-302, RR-308, RR-309, RR-310, RR-312, RR-317, RR-318, RR-319, RR-322, RR-323, RR-326, RR-327, RR-332, RR-337, RR-348, RR-350, RR-354, RR-357, RR-358, RR-359, RR-364, RR-365, RR-367, RR-368, RR-369, RR-370, RR-373, RR-374, RR-378, RR-386, RR-387, RR-395, RR-396, RR-397, RR-398, RR-400, RR-401, RR-403, RR-404, RR-407, RR-408, RR-410, RR-416, RR-418, RR-419, RR-420, RR-421, RR-426, RR-427, RR-428, RR-432, RR-437, RR-439, RR-441, RR-442, RR-443, RR-445, RR-446, RR-447, RR-448, RR-449, RR-452, RR-454, RR-456, RR-457, RR-458, RR-459, RR-460, RR-461, RR-462, RR-464, RR-467, RR-468, RR-471, RR-472, RR-474, RR-476, RR-477, RR-480, RR-487, RR-489, RR-495, RR-496, RR-497, RR-498, RR-499, RR-500, RR-505, RR-507, RR-508, RR-509, RR-516, RR-521, RR-528, RR-529, RR-531, RR-535, RR-542, RR-543, RR-544, RR-545, RR-546, RR-547, RR-555, RR-558, RR-559, RR-565, RR-566, RR-567, RR-568, RR-569, RR-571, RR-574, RR-577, RR-580, RR-585, RR-587, RR-588, RR-589, RR-593, RR-599, RR-600, RR-604, RR-607, RR-610, RR-611, RR-612, RR-617, RR-621, RR-622, RR-624, RR-626, RR-627, RR-631, RR-632, RR-634, RR-639, RR-640, RR-644, RR-649, RR-650, RR-652, RR-653, RR-654, RR-655, RR-657, RR-662, RR-665, RR-666, RR-667, RR-669, RR-670, RR-674, RR-677, RR-680, RR-682, RR-684, RR-687, RR-691, RR-693, RR-695, RR-696, RR-697, RR-698, RR-699, RR-701, RR-703, RR-704, RR-706, RR-708, RR-713, RR-714, RR-715, RR-720, RR-721, RR-723, RR-730, RR-736, RR-742, RR-743, RR-745, RR-746, RR-747, RR-748, RR-751, RR-753, RR-754, RR-755, RR-756, RR-757, RR-764, RR-765, RR-766, RR-767, RR-768, RR-770,	<ul style="list-style-type: none"> Worker generated traffic reduced through car sharing; and No roads to be fully closed to install the Project's cables under the public highway. <p>In addition, the OCTMP, Section 2.2.7(APP-586) contains a 'Network Resilience' strategy to reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during planned and unplanned events. Table 2.2 sets out the measures to mitigate the impact of construction traffic on the following events:</p> <ul style="list-style-type: none"> Sizewell B outages; Major events on the highway (e.g. bike races, parades, etc) and public holidays; Major incidents such as accidents on the highway; and Incidents involving contractors, such as, breakdowns, accidents, etc. <p>Embedded mitigation is secured by the OCTMP (APP-586) and the OTP(APP-588).</p>



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		RR-772, RR-778, RR-779, RR-785, RR-793, RR-795, RR-798, RR-799, RR-801, RR-802, RR-803, RR-805, RR-809, RR-810, RR-811, RR-815, RR-816, RR-823, RR-824, RR-827, RR-828, RR-830, RR-831, RR-833, RR-835, RR-839, RR-847, RR-850, RR-851, RR-852, RR-859, RR-861, RR-863, RR-864, RR-865, RR-866, RR-871, RR-873, RR-874, RR-876, RR-877, RR-878, RR-879, RR-880, RR-881, RR-882, RR-887, RR-888, RR-901, RR-902, RR-903, RR-905, RR-907, RR-911, RR-912, RR-913, RR-914, RR-916, RR-918.	
014	Disruption of public transport (driver delay)	RR-315,	<p>The Applicant notes queries raised in Relevant Representations regarding the impact upon public transport (driver delay).</p> <p>Chapter 26 - Traffic and Transport Section 26.6. 1.11 Impact 4: Driver Delay (Capacity) and section 26.6.1.12 Impact 5: Driver Delay (Highway Geometry) assess impacts relating to congestion. This assessment determines that the operation and functionality of the highway network is not significantly impacted by the Project's traffic and therefore it is implicit that there is not an impact on public transport. For further details see above response regarding emergency services.</p>
015	Total worker numbers	RR-443, RR-488, RR-536, RR-539, RR-619, RR-707, RR-840	<p>Responses quoted many different headline figures for total worker numbers per day. This response sets out the numbers the Applicant has estimated in the assessment.</p> <p>Worker number will fluctuate throughout construction and throughout the onshore development area.</p> <p>Appendix 26.15 provides the peak numbers for each section of the onshore development area, whilst Plate 30.22 in Chapter 30 - Tourism, Recreation and Socio-Economics (APP-078)</p>



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			<p>illustrates how this would fluctuate with time and with each section of the works. Peak worker numbers are expected to be 249.</p> <p>Cumulatively the Projects would have a combined peak workforce of 307.</p> <p>The peak traffic demand for workers has been derived by totalling the maximum number of workers that could be employed at each of the seven sections of the onshore development area at any time in the construction direction and totalling them together to create a theoretical 'combined worst case' month whereby the peak construction activity for all seven sections would occur concurrently.</p> <p>Daily worker traffic peaks (expressed as Light Goods Vehicles (LGVs), profiled by month, are summarised in Chapter 26 - Traffic and Transport Table 26.21 (APP-074) and Appendix 26.2 Table A26.2 (APP-528)</p>
016	Worker controls, sanctions etc.	RR-069, RR-072, RR-193, RR-194, RR-195, RR-202, RR-208, RR-300, RR-369, RR-370, RR-443, RR-487, RR-499, RR-500, RR-566, RR-593, RR-649, RR-684, RR-772, RR-775, RR-776, RR-805, RR-818, RR-819, RR-821, RR-837, RR-851, RR-907	<p>The Applicant notes queries raised in Relevant Representations regarding traffic and transport and the associated worker controls and possible sanctions.</p> <p>Chapter 26 - Traffic and Transport Section 26.6.1.4 covers assumptions on worker travel, car share ratios were discussed and agreed with the ETG.</p> <p>The assessment assumes a car share ratio of 1.5, with all employee trips reduced by a factor of 1.5 at entry point to the onshore highway study area. This approach simulates multi pick up of employees prior to entering the onshore highway study area typically by crew-van or car-share syndicates.</p>



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			<p>The ES chapter is supported by an OCTMP (APP-586) and an OTP (APP-588) which detail Controls, Measures, Monitoring and Enforcement regimes, Governance and Action Plans to reinforces commitments made in Chapter 26 - Traffic and Transport (APP-074) and presents the requirements and standards that will be complied with.</p> <p>These documents are secured under the requirements of the draft DCO (APP-023). The final detailed CTMP and TP will be produced post-consent, prior to commencement of the onshore construction of the Project and will be in line with the OCTMP (APP-586) and OTP (APP-588) (as required by the draft DCO (APP-023). Once contractors have been appointed, the final CTMP and TP measures would be further developed in consultation with Suffolk County Council (as the local highway authority) and agreed with East Suffolk Council (as the relevant local planning authority), prior to the commencement of onshore works.</p>
017	"Rat runs"	RR-069, RR-148, RR-149, RR-171, RR-182, RR-202, RR-236, RR-369, RR-370, RR-383, RR-445, RR-446, RR-447, RR-448, RR-449, RR-473, RR-547, RR-595, RR-598, RR-611, RR-612, RR-691, RR-741, RR-759, RR-760, RR-772, RR-775, RR-776, RR-789, RR-790, RR-805, RR-818, RR-819, RR-835, RR-837, RR-851, RR-873, RR-889, RR-890,	<p>Responses were received suggesting that the construction traffic will lead to changes in the public's behaviour whereby impacts upon the highway network lead to individuals choosing to amend their routes to avoid congestion by using interconnecting roads or 'rat-running'. A change in drivers route choice would be induced by significant changes to the highway network operational performance leading to driver delay.</p> <p>Chapter 26 - Traffic and Transport Section 26.6. 1.11 and section 26.6.1.12 assess impacts relating to congestion. This assessment determines that the operation and functionality of the</p>



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			<p>highway network is not significantly impacted by the Project's traffic and therefore there are no significant Driver Delay impacts.</p> <p>To support the functionality of the highway network, embedded mitigation measures are identified to limit Driver Delay impacts to not significant as follows:</p> <ul style="list-style-type: none"> • A cable corridor haul route that reduces HGV movements on the public highway; • A booking system to enable a daily profile of deliveries to be maintained and ensure that the required deliveries are regularly forecast and planned; • Worker generated traffic reduced through car sharing; and • No roads to be fully closed to install the Project's cables under the public highway. <p>In addition, the OCTMP Section 2.2.7(APP-586) contains a 'Network Resilience' strategy to reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during planned and unplanned events. Table 2.2 sets out the measures to mitigate the impact of construction traffic on the following events:</p> <ul style="list-style-type: none"> • Sizewell B outages; • Major events on the highway (e.g. bike races, parades, etc) and public holidays; • Major incidents such as accidents on the highway; and



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			<ul style="list-style-type: none"> Incidents involving contractors, such as, breakdowns, accidents, etc. <p>This embedded mitigation is secured by the OCTMP (APP-586) and the OTP (APP-588). The final detailed CTMP and TP will be produced post-consent, prior to commencement of the onshore construction of the Project, and will be in line with the OCTMP and OTP (as required by the draft DCO (APP-023)). Once contractors have been appointed, the final CTMP and TP measures would be further developed in consultation with Suffolk County Council (as the local highway authority) and agreed with East Suffolk Council (as the relevant local planning authority), prior to the commencement of works.</p>
018	Cumulative impacts with Sizewell C	RR-018, RR-019, RR-020, RR-021, RR-022, RR-023, RR-025, RR-042, RR-043, RR-050, RR-068, RR-069, RR-072, RR-074, RR-087, RR-105, RR-106, RR-108, RR-116, RR-132, RR-136, RR-137, RR-139, RR-141, RR-143, RR-148, RR-149, RR-151, RR-163, RR-166, RR-167, RR-173, RR-178, RR-182, RR-188, RR-193, RR-194, RR-195, RR-203, RR-204, RR-207, RR-208, RR-209, RR-211, RR-220, RR-223, RR-224, RR-233, RR-236, RR-238, RR-239, RR-240, RR-244, RR-245, RR-246, RR-247, RR-263, RR-266, RR-270, RR-272, RR-280, RR-283, RR-289, RR-290, RR-295, RR-296, RR-298, RR-300, RR-308, RR-314, RR-325, RR-326, RR-354, RR-358, RR-359, RR-361, RR-364, RR-365, RR-367, RR-368, RR-369, RR-370, RR-386, RR-388, RR-396, RR-400, RR-405, RR-406, RR-413, RR-427, RR-433, RR-437, RR-439, RR-441, RR-447, RR-448, RR-449, RR-452, RR-454, RR-458, RR-459, RR-467, RR-468, RR-472, RR-473, RR-476, RR-477, RR-495, RR-499, RR-505, RR-523, RR-528,	<p>The Applicant notes queries raised in Relevant Representations regarding cumulative traffic and transport impacts associated with Sizewell C.</p> <p>Chapter 26 - Traffic and Transport Section 26.7.2.1 covers cumulative impacts with Sizewell C construction.</p> <p>The worst-case cumulative scenario for the Project is the simultaneous construction of both the Projects with Sizewell C.</p> <p>Subsequent to agreeing the cumulative assessment approach with the Traffic and Transport ETG, EDF Energy embarked upon their Stage 4 consultation exercise. The Stage 4 consultation did not contain sufficient information to facilitate a quantitative assessment. Recognising that Stage 3 information released by EDF Energy was out of date, a quantitative cumulative assessment could not be provided for the application as it would have been based upon out of date and incorrect information.</p>



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		RR-531, RR-544, RR-545, RR-546, RR-547, RR-552, RR-555, RR-565, RR-566, RR-571, RR-574, RR-577, RR-585, RR-587, RR-593, RR-599, RR-600, RR-610, RR-617, RR-619, RR-627, RR-632, RR-637, RR-639, RR-644, RR-652, RR-653, RR-665, RR-666, RR-677, RR-682, RR-684, RR-691, RR-699, RR-706, RR-707, RR-708, RR-720, RR-721, RR-736, RR-737, RR-743, RR-745, RR-746, RR-747, RR-754, RR-764, RR-773, RR-776, RR-782, RR-783, RR-794, RR-798, RR-801, RR-802, RR-803, RR-811, RR-813, RR-814, RR-815, RR-816, RR-827, RR-829, RR-834, RR-835, RR-837, RR-851, RR-855, RR-864, RR-865, RR-866, RR-868, RR-871, RR-873, RR-874, RR-876, RR-877, RR-878, RR-879, RR-880, RR-885, RR-887, RR-893, RR-902, RR-908, RR-909, RR-916, RR-917, RR-918, RR-919	The Applicant therefore agreed with the Traffic and Transport ETG to update the cumulative assessment. The Applicant has committed to carrying out full quantitative CIAs for these topics. The required information to inform this has now been submitted within the Sizewell C New Nuclear Power Station Application. The updated CIA (as appropriate) will be submitted during the Examination of the Project.



2.32 Water Resources and Flood Risk

Table 32 Applicant's Comments on Water Resources and Flood Risk

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	General	RR-043, RR-069, RR-089, RR-093, RR-094, RR-100, RR-106, RR-108, RR-120, RR-125, RR-128, RR-132, RR-143, RR-148, RR-149, RR-167, RR-169, RR-171, RR-184, RR-188, RR-195, RR-202, RR-209, RR-215, RR-223, RR-224, RR-226, RR-231, RR-234, RR-238, RR-242, RR-246, RR-247, RR-250, RR-254, RR-261, RR-268, RR-281, RR-283, RR-289, RR-290, RR-295, RR-300, RR-302, RR-308, RR-326, RR-327, RR-330, RR-331, RR-338, RR-339, RR-340, RR-350, RR-363, RR-365, RR-375, RR-378, RR-381, RR-386, RR-401, RR-408, RR-420, RR-426, RR-427, RR-434, RR-437, RR-439, RR-442, RR-445, RR-446, RR-447, RR-448, RR-449, RR-453, RR-474, RR-489, RR-491, RR-495, RR-498, RR-545, RR-547, RR-554, RR-559, RR-571, RR-577, RR-587, RR-588, RR-589, RR-597, RR-604, RR-611, RR-612, RR-613, RR-617, RR-632, RR-634, RR-637, RR-639, RR-644, RR-650, RR-651, RR-665, RR-671, RR-679, RR-690, RR-692, RR-697, RR-702, RR-708, RR-711, RR-735, RR-741, RR-755, RR-756, RR-761, RR-762, RR-765, RR-770, RR-771, RR-772, RR-775, RR-781, RR-782, RR-783,	<p>Relevant Representations in relation to water resources and flood risk received from the wider community raised issues concerning:</p> <ul style="list-style-type: none"> • The impact of the onshore substation and National Grid infrastructure upon the existing surface water runoff, flood regime (including reference to farmland and local road network) and existing flood defences serving the village of Friston; • The proposed mitigation measures in relation to flood risk and their feasibility, including the proposed Sustainable Urban Drainage (SUDs) ponds capacity to attenuate runoff in heavy rainfall events; • The adequacy of the assessment of flooding (pluvial) within the application and the level of consideration given to flooding within the draft DCO (APP-023); • Contamination of surface and groundwater; and • The unsuitability of burying onshore cables within areas of flood risk. <p>Chapter 20 Water Resources and Flood Risk (APP-068) provides an assessment of the impacts to flooding arising from the Project. The chapters accompanying appendices, Appendix 20.1 to 20.5 (APP-494 to APP-498), provide further information on detailed aspects of this assessment.</p> <p>Pre-application consultation with regard to water resources and flood risk was undertaken via the Water Resources and Flood Risk Expert Topic Group (ETG), described within Chapter 5 EIA Methodology (APP-054). Meetings were held in April 2018, November 2018 and May 2019. The Water Resources and Flood Risk ETG stakeholder membership comprised the relevant technical leads from East</p>



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No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-786, RR-794, RR-797, RR-798, RR-802, RR-803, RR-814, RR-815, RR-816, RR-818, RR-819, RR-821, RR-827, RR-829, RR-842, RR-843, RR-849, RR-865, RR-873, RR-881, RR-882, RR-884, RR-885, RR-887, RR-889, RR-890, RR-904, RR-906, RR-908, RR-909, RR-042, RR-095, RR-096, RR-098, RR-105, RR-127, RR-131, RR-133, RR-155, RR-173, RR-214, RR-240, RR-244, RR-258, RR-263, RR-267, RR-272, RR-296, RR-298, RR-315, RR-383, RR-436, RR-443, RR-463, RR-465, RR-532, RR-546, RR-552, RR-581, RR-595, RR-598, RR-609, RR-626, RR-629, RR-652, RR-653, RR-670, RR-706, RR-709, RR-715, RR-738, RR-753, RR-776, RR-788, RR-801, RR-804, RR-835, RR-848, RR-864, RR-871, RR-874, RR-876, RR-902	<p>Suffolk Council, Suffolk County Council, the Environment Agency, East Suffolk Internal Drainage Board (the Water Level Management Alliance), Essex and Suffolk Water and Anglian Water. The ETG discussed the methodology for the assessment and the assumptions within it. The assessment of flood risk presented in Appendix 20.3 Flood Risk Assessment (APP-496) took account of the guidance set out within the National Planning Policy Framework (NPPF) Planning Practice Guidance (PPG) for Flood Risk and Coastal Change as well as the Environment Agency's Climate Change Allowance Guidance. The Water Framework Directive (WFD) assessment presented within Appendix 20.4, which assesses impacts to a waterbody's biological and physiochemical properties, took account of the following guidance predominantly published by the Environment Agency:</p> <ul style="list-style-type: none"> • WFD risk assessment: How to assess the risk of your activity (Environment Agency 2016a)²³; • Protecting and improving the water environment: WFD compliance of physical works in rivers (Environment Agency 2016b)²⁴; and • Planning Inspectorate Advice Note 18: The WFD. <p>Chapter 20 Water Resources and Flood Risk (APP-068) covered the following construction phase impacts:</p> <ul style="list-style-type: none"> • Impact 1 - Direct disturbance of surface water bodies • Impact 2 - Increased sediment supply • Impact 3 - Accidental release of contaminants

²³ Environment Agency (2016a) WFD Risk Assessment Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522426/LIT_10445.pdf

²⁴ Environment Agency, (2016b) Protecting and improving the water environment: Water Framework Directive compliance of physical works in rivers (Position Statement 488_10, version 2).



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No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
			<ul style="list-style-type: none"> Impact 4 - Changes to surface water runoff and flood risk <p>Chapter 20 Water Resources and Flood Risk (APP-068) covered the following operation phase impacts:</p> <ul style="list-style-type: none"> Impact 1 - Changes to surface water runoff, groundwater flows and flood risk Impact 2 - Supply of fine sediment and other contaminants
002	Impact of the projects on surface water runoff and flood risk	RR-027, RR-044, RR-069, RR-089, RR-093, RR-132, RR-149, RR-178, RR-184, RR-197, RR-231, RR-299, RR-302, RR-338, RR-339, RR-365, RR-366, RR-369, RR-370, RR-392, RR-421, RR-458, RR-464, RR-467, RR-468, RR-473, RR-480, RR-541, RR-596, RR-605, RR-649, RR-664, RR-736, RR-759, RR-816, RR-834, RR-837, RR-851, RR-852, RR-127, RR-133, RR-155, RR-315, RR-358, RR-359, RR-383, RR-436, RR-609, RR-610, RR-616, RR-776, RR-804, RR-835,	<p>The Applicant notes that Relevant Representations raised concerns surrounding the impact of the Projects upon the existing flooding regime, with multiple representations stating that the installation of the project substations and National Grid infrastructure at Friston may exacerbate the existing flood risk.</p> <p>Operation phase Impact 2 presented in Section 29.6.2.1 of Chapter 20 Water Resources and Flood Risk (APP-068) considers the impact on flood risk arising from the Project. Following implementation of the embedded and additional mitigation measures proposed, the residual impact for increased surface runoff and flood risk during the operation period is assessed as minor adverse for the Hundred River, Leiston Beck and Friston Watercourse catchments and underlying groundwater. The assessment concluded a degree of betterment over existing runoff characteristics to downstream receptors in the Friston watercourse would be experienced due to surface water attenuation delivered through the embedded mitigation measures at the substation location.</p> <p>The Applicant is aware that Suffolk County Council have, since the submission of the Application for the Project, collected new data with regard to the hydrological regime within Friston and the surrounding area. This information is being reviewed with both East Suffolk Council and Suffolk County Council. As part of the detailed design process post-consent, further hydrological modelling of the baseline environment will be undertaken in order to ensure that changes to the onshore</p>



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			<p>substation or National Grid infrastructure or changes to the baseline environment are captured.</p> <p>Detailed design of the surface water system design will be undertaken prior to construction commencing and will involve the establishment of a catchment hydraulic model which will reflect baseline conditions at the time and will incorporate the detailed design of the onshore substation and National Grid infrastructure.</p> <p>Chapter 20 Water Resources and Flood Risk (APP-068) acknowledges the Project may give rise to potential effects on agricultural land and property along the length of the onshore development area as a result of changes to surface water flows, runoff and drainage patterns during the construction phase. Provided the proposed embedded and additional mitigation set out within the chapter is implemented, the residual impact has been assessed as minor adverse for the Hundred River, Leiston Beck and Friston Watercourse catchments and the underlying groundwater.</p>
003	Mitigation measures in relation to flooding	RR-069, RR-132, RR-149, RR-184, RR-330, RR-331, RR-338, RR-339, RR-366, RR-369, RR-370, RR-421, RR-445, RR-487, RR-639, RR-649, RR-664, RR-736, RR-759, RR-761, RR-764, RR-773, RR-781, RR-782, RR-783, RR-829, RR-834, RR-837, RR-851, RR-852, RR-885, RR-887, RR-133, RR-155, RR-776, RR-835	<p>The Applicant notes queries raised within the Relevant Representations regarding mitigation measures in relation to flooding.</p> <p>Embedded mitigation in relation to surface water runoff and flood risk is presented within section 20.3.3 and Table 20.3 of Chapter 20 Water Resources and Flood Risk (APP-068). Issues pertinent to construction phase drainage, including consideration of surface water runoff, will be managed through the development and implementation of both a Surface Water and Drainage Management Plan and a Flood Management Plan to be prepared and submitted to the local planning authority post-consent as part of the Code of Construction Practice, as secured under the Requirement 22 of the draft Development Consent Order (DCO) (APP-023). The Surface Water and Drainage Management Plan will secure measures which limit discharges to a controlled rate (equivalent to the greenfield runoff rate) and ensure that any redirected overland flow routes do not cause an increase in off-</p>



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			<p>site flood risk. Onshore works cannot commence until these plans have been approved by the relevant local planning authority.</p> <p>Operation phase drainage measures will be secured through the production and implementation of a Landscape Management Plan to be prepared post-consent in line with the requirements set out in the draft DCO. The final Landscape Management Plan will be based upon the Outline Landscape and Ecological Management Strategy (APP-584). Section 20.6.2.1.2 of Chapter 20 Water Resources and Flood Risk (APP-068) sets out additional mitigation measures to be implemented for the operation phase that will mitigate impacts in relation to surface water runoff and flood risk, and the Applicant has demonstrated that implementation of these mitigation measures is feasible.</p> <p>In addition, the Applicant has retained the option to install further attenuation measures along the existing surface water flow route during the detailed design phase. The Applicant has committed to providing an additional surface water management SuDS basin to reduce water in-flow rates to the substation area and potentially reduce flood risk for the village of Friston.</p> <p>Discussions regarding these matters are ongoing between the Applicant and the local planning authorities through the statement of common ground process.</p>
004	Adequacy of assessment in terms of flooding	RR-069, RR-132, RR-144, RR-145, RR-148, RR-149, RR-171, RR-184, RR-195, RR-197, RR-231, RR-338, RR-339, RR-366, RR-369, RR-370, RR-375, RR-392, RR-473, RR-480, RR-487, RR-597, RR-611, RR-612, RR-649, RR-664, RR-665, RR-736, RR-764, RR-771, RR-772, RR-773, RR-775, RR-816, RR-818, RR-819, RR-834, RR-851, RR-852, RR-904, RR-906, RR-133, RR-383.	<p>The Applicant notes concerns within Relevant Representations regarding the adequacy of the flood risk assessment.</p> <p>The assessment presented within Chapter 20 Water Resources and Flood Risk (APP-068) and its associated appendices (APP-494 to APP-498) has been undertaken in accordance with the methodology agreed with the Water Resources and Flood Risk ETG (see section 20.2 of Chapter 20). All impacts scoped into the assessments were agreed with the relevant stakeholders and refined during the pre-application consultation process. The Applicant's assessment of flood risk arising from the project and upon the project presented within Appendix 20.3</p>



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			Flood Risk Assessment (APP-496) complies with the requirements of the relevant Overarching National Policy Statement for Energy (EN-1) (set out within Section 5.7). The Applicant considers the flood risk assessment undertaken to be accurate and robust.
005	Contamination of surface and groundwater	RR-093, RR-132, RR-169, RR-178, RR-184, RR-238, RR-283, RR-302, RR-338, RR-339, RR-340, RR-365, RR-366, RR-369, RR-370, RR-421, RR-473, RR-649, RR-664, RR-736, RR-759, RR-816, RR-837, RR-851, RR-852, RR-027, RR-044, RR-231, RR-363, RR-541, RR-089, RR-127, RR-133, RR-149, RR-155, RR-315	<p>The Applicant notes Relevant Representations raised concerns regarding the possibility of contamination of surface and groundwater.</p> <p>Construction phase impacts associated within an increased sediment supply and the potential accidental release of contaminants upon surface and groundwater features are assessed respectively within section 20.6.1.2 and section 20.6.1.3 of Chapter 20 Water Resources and Flood Risk (APP-068). Additional mitigation measures proposed for these impacts are presented within section 20.6.1.2.2 and section 20.6.1.3.2 and include:</p> <ul style="list-style-type: none"> Retaining buffer strips of vegetation where possible to intercept runoff (with a commitment to reseed areas where it is not possible to retain vegetated buffer strips). Keeping cable installations shallow (approximately 1.2m under the ground surface) where possible, although deeper excavations may be required for the crossing of services and watercourses; and Adopting best available construction techniques for the cable installation. <p>An additional mitigation measure presented within section 20.6.1.3.2 to undertake hydrogeological risk assessments is currently being reviewed and discussed with the Environment Agency as part of the Statement of Common Ground (SoCG) process, such that Hydrogeological Risk Assessments will be undertaken for all construction activities within 250m of known abstractions. Once agreement has been reached between the Applicant and the Environment Agency, the updated</p>



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			<p>mitigation measure will be captured within an updated Outline Code of Construction Practice (APP-578).</p> <p>With the implementation of the embedded mitigation presented within section 20.3.3 of Chapter 20 Water Resources and Flood Risk, as well as the additional mitigation measures referred to above, the residual impacts upon water resources from both increased sediment supply and accidental releases of contaminants during construction have been assessed as minor adverse in EIA terms.</p> <p>Operation phase impacts associated within the runoff of fine sediment and other contaminants from the onshore substation and associated National Grid infrastructure to surface and groundwaters have been assessed as minor adverse within section 20.6.2.2 of Chapter 20 Water Resources and Flood Risk (APP-068), following the implementation of embedded mitigation measures within section 20.3.3 and additional mitigation measures within section 20.6.2.2.2.</p>
006	Project design (buried cables) with regard to flood risk	RR-143, RR-350, RR-821	<p>The Applicant notes comments within Relevant Representations regarding the Project design with regards to flood risk.</p> <p>Section 6.7.2 of Chapter 6 Project Description (APP-054) provides a description of the onshore cable installation. The strategic-level project design alternatives considered, which resulted in the decision to bury onshore cables is detailed in Table 4.1 of Chapter 4 Site Selection and Assessment of Alternatives (APP-052). Primarily, this was to minimise the visual impact of the onshore cable route.</p> <p>The impact of buried cables upon surface water runoff and flood risk is considered within section 20.6.2.1 of Chapter 20 Water Resources and Flood Risk (APP-068). Following the implementation of the proposed embedded and additional mitigation, no significant impact has been assessed for changes to surface water runoff and flood risk in the Hundred River, Leiston Beck and Friston Watercourse catchments.</p>



2.33 Woodland

Table 33 Applicant's Comments on Woodland

No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
001	Impact to woodlands	RR-023, RR-088, RR-129, RR-138, RR-162, RR-196, RR-222, RR-245, RR-251, RR-253, RR-310, RR-323, RR-328, RR-340, RR-343, RR-369, RR-401, RR-416, RR-421, RR-430, RR-435, RR-449, RR-451, RR-509, RR-535, RR-567, RR-611, RR-612, RR-614, RR-621, RR-629, RR-649, RR-664, RR-674, RR-684, RR-693, RR-698, RR-703, RR-748, RR-751, RR-786, RR-812, RR-823, RR-834, RR-837, RR-839, RR-851, RR-885, RR-888, RR-911, RR-912	<p>The Applicant notes queries raised in Relevant Representations regarding potential impacts on woodland.</p> <p>From an early stage in the planning process the Applicant has avoided impacts on ancient woodland through the site selection process (see Chapter 4 Site Selection and Assessment of Alternatives (APP-052)). Ancient woodland at Grove Wood is on the boundary of the onshore development area and Great Wood and Buckle's Wood are 1.5km and 1.75km away from the order limits, respectively. As stated in sections 22.6.1.3 and 22.6.1.4 of Chapter 22 Onshore Ecology (APP-070) woodland at Grove Wood will be retained and therefore, there will be no impact upon ancient woodland.</p> <p>Section 22.6.1.4 of Chapter 22 Onshore Ecology (APP-070) states that there are three locations where woodland losses will be unavoidable, however woodland at Grove Wood will not be directly impacted. As part of embedded mitigation, the onshore infrastructure will avoid areas of woodland and scrub where practicable as stated in section 5.2.2 of the OLEMS (APP-584). Section 5.2.3.1 details that a pre-construction walkover survey would be undertaken by the Arboricultural Clerk of Works (ACoW), Ecological Clerk of Works (ECoW) and an engineer to assist in micro-siting of accesses, haul road and jointing bays along the onshore cable route to minimise woodland, tree and scrub loss. The surveys would show actual position of trees, their condition and value and indicate the extent of root protection zones. Section 22.6.1.4.2 of Chapter 22 Onshore Ecology (APP-070) details mitigation measures, such as fencing off root protection areas to ensure that no damage to retained trees is incurred.</p> <p>Potential impacts on other types of woodland are assessed in 22.6.1.4 of Chapter 22 Onshore Ecology (APP-070). Table 22.18 of the chapter summarises the</p>



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			<p>area of each type of woodland present within the onshore development area and the realistic worst case tree removal anticipated. The types of woodland present are broadleaved woodland (semi-natural), broadleaved woodland (plantation) and mixed woodland (plantation). Broadleaved woodland (semi-natural) makes up the greatest proportion of woodland within the onshore development area at 7.9ha which is approximately 2.5% of the onshore development area and of which there is potential to lose no more than 1.1ha of during construction. Requirement 21 of the draft DCO (APP-023) states that no onshore works can commence until an arboricultural method statement forming part of the Ecological Management Plan (which must reflect the survey results and ecological mitigation measures included in the Environmental Statement), has been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body. Following the implementation of the agreed mitigation measures considered necessary, there should be no net loss of trees; however, there remains a temporary loss of trees and so the assessment concluded an impact of minor adverse significance which is not significant in EIA terms.</p>
002	Loss of woodland	RR-072, RR-095, RR-132, RR-137, RR-146, RR-148, RR-160, RR-171, RR-180, RR-188, RR-202, RR-203, RR-213, RR-215, RR-234, RR-249, RR-252, RR-278, RR-279, RR-330, RR-333, RR-440, RR-341, RR-348, RR-357, RR-367, RR-370, RR-378, RR-429, RR-436, RR-450, RR-477, RR-478, RR-490, RR-494, RR-510, RR-524, RR-531, RR-532, RR-543, RR-547, RR-558, RR-559, RR-563, RR-592, RR-645, RR-664, RR-684, RR-694, RR-705, RR-706, RR-708, RR-709, RR-710, RR-731, RR-739,	<p>The Applicant notes concerns raised within Relevant Representations regarding the loss of woodland.</p> <p>Impacts to woodland and trees have been considered within Chapter 22 Onshore Ecology (APP-070) section 22.6.1.4 (Impact 4). As part of the embedded mitigation, the onshore infrastructure will avoid areas of woodland where practicable. Table 22.18 of Chapter 22 Onshore Ecology (APP-070) states that 1.1ha of semi-natural broadleaved woodland could potentially be affected by the construction of the Project. With the implementation of additional mitigation measures (section 22.6.1.13), the residual impact on woodland is assessed as minor adverse significance. Mitigation measures are set out in the Outline Landscape and Ecological Management Strategy (OLEMS) (APP-584). With respect to woodland:</p>



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No.	Topic / Issue	Relevant Representation Number	Applicant's Comments
		RR-747, RR-749, RR-763, RR-766, RR-772, RR-775, RR-787, RR-811, RR-837, RR-841, RR-845, RR-850, RR-851, RR-869, RR-870, RR-877, RR-887, RR-892, RR-902	<ul style="list-style-type: none"> Following the construction phase, woodland habitat will be fully reinstated as far as possible; Where full reinstatement is not possible surrounding the above ground operational infrastructure (onshore substation and National Grid infrastructure), planting and landscaping has been proposed which seeks to, among other objectives, benefit ecological species surrounding the onshore substation and National Grid infrastructure (for further details please see the OLEMS); Post-consent a final Landscape Management Plan (LMP) will be produced and agreed with the Local Planning Authority. Planting of woodland blocks will provide habitat for local wildlife, including protected species such as badgers. These areas of woodland may also provide roosts for bat species as individual trees mature. <p>Impacts on ancient woodland are assessed in sections 22.5.2 and 22.6.1.1.3 of Chapter 22 Onshore Ecology (APP-070). There is no ancient woodland within the onshore development area. Ancient woodland at Grove Wood is on the boundary of the onshore development area and Great Wood and Buckle's Wood are 1.5km and 1.75km away from the boundary respectively. There is therefore no pathway for impact upon ancient woodland. The Applicant notes Natural England's Standing Advice regarding development bordering Ancient Woodland and therefore a 15m buffer zone around the Ancient Woodland at Grove Wood will be adhered to where practicable. The Applicant commits to no onshore cable route trenches or the haul road within the 15m buffer zone. Examples of exceptions to the 15m buffer would be landscaping, signage, Public Right of Way diversions and ecological mitigation areas.</p>