



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

East Anglia TWO Offshore Wind Farm

Appendix J1 to the Natural England Deadline 1 Submission

Natural England's Review of Relevant Representations from Other Parties

For:

The construction and operation of East Anglia Two Offshore Windfarm, a 900MW windfarm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

2nd November 2020



Appendix J1 Natural England's Review of Relevant Representations from Other Parties

This document is applicable to both the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

Following submission of Natural England's and other consultees Relevant Representations regarding the construction and operation of East Anglia One North Wind Farm, Natural England has reviewed other interested parties Relevant Representations, and comment on the major issues within the remit of Natural England.

The relevant comments from other consultees, most pertinent to Natural England, are summarised in Table 1, together with Natural England's position on the comments. These comments are colour coded as:

Green - comments support/agree with NE position or does not impact on NE concerns

Amber - NE comments may be in contradiction further advice needed, or potential new issue not included in NE comments

Red - Comments in direct contradiction/argument with NE position or represents a significant issue not mentioned in NE relevant reps

Grey Comments – Comments that are not relevant to NE



Table 1: Summary of Other Parties representations and Natural England’s position (if relevant)

Point	Stakeholder	Relevant work stream	Summary of Stakeholder Comments	Support / Contradict Natural England Position with Comments
1	Eastern Inshore Fisheries & Conservation Authority (EIFCA)	Offshore Ornithology	<i>Outer Thames Estuary SPA</i> Eastern IFCA support the decision to use Horizontal Direction Drilling (HDD) at landfall as embedded mitigation to avoid impacts on sensitive intertidal habitats receptors for red throated divers. EIFCA defer to Natural England and the JNCC for detailed conservation advice including any need to consider other activities that could cause cumulative impacts to sensitive species or habitats.	Supports
2	Eastern Inshore Fisheries & Conservation Authority (EIFCA)	Marine Mammals	EIFCA supports the use of mitigation measures such as establishing a mitigation zone and the activation of acoustic deterrent devices prior to soft-start during piling to aim to remove marine mammals from the mitigation zone prior to the start of piling to reduce the risk of any physical or auditory injury.	Supports
3	Eastern Inshore Fisheries & Conservation Authority (EIFCA)	Cumulative Impacts	The cumulative impacts of multiple windfarms within the area (including Sizewell C) and the wider area of the SNS and dredging areas on marine life and on the viability of the inshore fishing industry need to be properly considered during planning and should be informed by full consultation with relevant stakeholders. Asks for engagement with inshore fishery stakeholder and he impacts should be considered in combination, highlighting any potential cumulative effects associated with the application and guiding decision making and plan implementation in a stepwise approach.	In line with Natural England in considering cumulative impacts
4	Eastern Inshore Fisheries & Conservation Authority (EIFCA)	Nursery and Spawning Grounds	EIFCA defer to Natural England for formal conservation advice on sandeels as a prey species for Harbour porpoise, because of cumulative effects on seabed habitats such as for sandeels.	In line with Natural England



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5	Eastern Inshore Fisheries & Conservation Authority (EIFCA)	<i>Sabellaria</i> Reef Habitat - Micrositing	EICFA acknowledge that “micrositing mitigation would be agreed through consultation with the MMO and Natural England on the identified sensitive features which are required to be avoided (e.g. <i>Sabellaria reef</i>) and subsequently through the Design Plan IPMP (document reference 8.13), secured within the DCO”. Eastern IFCA defer to Natural England to provide formal conservation advice, and agree suitable mitigation to reduce potential impacts on <i>S.spinulosa</i> . Eastern IFCA support and strongly encourage the decision to use micrositing within the identified offshore cable corridor for known areas of <i>S. spinulosa</i> reef identified in the footprint.	Micrositing mitigation - in Line EIFCA agrees with advice and recommendations from Natural England
6	Eastern Inshore Fisheries & Conservation Authority (EIFCA)	Cabling Impacts	Eastern IFCA have concerns over the requirement for rock armouring cable protection, due to the potential impacts on soft-sediment habitats and on the fishing industry. Using cable armouring instead of cable burial increase the likelihood of adverse long-term environmental and fisheries impacts.	Supports preference for cable burial
7	Eastern Inshore Fisheries & Conservation Authority (EIFCA)	Electromagnetic Fields	Eastern IFCA would very much like to see regular updates on the latest understanding of electromagnetic fields and their impacts on marine life, which could develop significantly during the examination. Eastern IFCA defer to Natural England and Cefas for formal conservation advice on impacts of electromagnetic fields and whether precautionary mitigation should be required.	NE didn't provide comments on Electromagnetic Field, but have provided comment on the minimum burial depth a key mitigation for EMF.



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8	Royal Society for the Protection of Birds (RSPB)	2. Offshore Ornithology Impacts	<p>Alone - potential adverse effects on the integrity of the gannet population of the Flamborough and Filey Coast (FFC) SPA as a result of predicted collision mortality</p> <p>Collision risk - from the project in-combination and cumulatively with other projects:</p> <ul style="list-style-type: none"> • The gannet population of the Flamborough and Filey Coast SPA; • The kittiwake population of the Flamborough and Filey Coast SPA; • The lesser black-backed gull population of the Alde-Ore Estuary SPA. <p>RSPB consider that cumulative (EIA) collision risk impacts on gannet, kittiwake, great black-backed gull and lesser black-backed gull are significant. In addition, we consider the EIA cumulative collision risk impacts on greater black backed gulls are significant.</p> <p>Displacement from this project in-combination and cumulatively with others there are potential adverse effects on the integrity of:</p> <ul style="list-style-type: none"> • The razorbill population of the Flamborough and Filey Coast SPA; • The guillemot population of the Flamborough and Filey Coast SPA; • The red-throated diver population of the Outer Thames Estuary SPA. <p>RSPB also consider that cumulative (EIA) displacement impacts on red-throated diver, guillemot and razorbill are significant.</p> <p>Not possible to rule out adverse effects on the integrity of the following feature from this project in-combination with others: The breeding seabird assemblage of the Flamborough and Filey Coast SPA.</p>	Supports the statements on collision risks and displacement
9		3. Offshore Ornithology - Collision Risk Assessment Concerns	a) Apportionment lesser black-backed gull collision mortality calculation dilutes the potential significance of impact on the Alde-Ore Estuary SPA.	In line - NE working with SNCB on (b)



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			b) Gannet Avoidance Rate. As the BTO avoidance rate review was heavily biased to non-breeding gannets, we prefer a more precautionary AR of 98% for the breeding season.	
10		4. Offshore Ornithology – Consented Capacity of Windfarms	It is stated that many of the collision estimates for other windfarms are based on higher numbers of turbines than were actually built. This is an acceptable point for windfarms where the DCO has been amended and therefore there is legal certainty regarding the reduction. Where windfarms still have their original DCOs (and Crown Estate licences), it is not appropriate to do anything less than assess the full extent of those DCOs when considering in-combination/cumulative effects e.g. on lesser black-backed gull, gannet and kittiwake.	Supports
11	Royal Society for the Protection of Birds (RSPB)	6. Derogation and HRA	RSPB's key concern is that the derogation tests under Habitats Regulations are properly explored and tested through the Examination.	Supports
12	Royal Society for the Protection of Birds (RSPB)	5. Onshore ornithology impacts	The RSPB has raised concerns about potential disturbance and loss of habitat affecting breeding woodlark and nightjar of the Sandlings SPA and turtle dove and nightingale populations associated with the Leiston-Aldeburgh SSSI. Concerns about the potential for disturbance to affect SPA species during the construction period due to the proximity of nightjar and woodlark territories to the proposed cable route and consider that more information is required regarding the timeline and details of the construction work within the SPA.	Supports – NE have also asked for further information
13	Marine Management Organisation (MMO)	Development Consent Order (DCO)	1.1.2 The MMO does not agree with the definition of 'commence' in relation to 'offshore preparation works'. The term "including but not limited to surveys, monitoring and UXO clearance" is not sufficiently precise and has the potential to authorise works which may have the potential to impact upon the environment prior to the approval of appropriate methodologies (e.g. boulder clearance and sandwave levelling). The MMO	Supports



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			recommends that the words “but not limited to” are removed from the definition of offshore preparation works here and in the definitions for the associated deemed marine licences (DMLs) in Schedules 13 and 14.	
14	Marine Management Organisation (MMO)	Development Consent Order (DCO)	1.1.3. The MMO does not consider that installation of new cable and scour protection post-construction falls within the definition of ‘maintain’. It is recommended that new benthic surveys are undertaken prior to installation of rock protection for cable repairs to ensure that any required mitigation for protected habitats such as <i>Sabellaria</i> reef can be properly secured at the time. The MMO and Natural England have drafted joint position papers on this issue which offer guidance on the expected marine licensing requirements for such activities. Final versions of the guidance are expected to be approved in time for the Planning Inspectorate hearings.	Supports
15	Marine Management Organisation (MMO)	Deemed Marine Licenses (DML)	1.1.4 and 1.1.5. The MMO does not consider that any Unexploded Ordnance (UXO) campaign should be authorised through conditions on the DMLs. UXO campaigns are high risk activities which require detailed, complex impact assessments, conditions and enforcement. It is the MMO’s opinion that this activity should be removed from the DMLs and for the MMO to determine an application for the activities in a separate marine licence post-consent, in consultation with relevant stakeholders. The Applicant will need to separately apply to the MMO for a separate European Protected Species (EPS) licence in order to authorise any UXO campaign for the project.	NE supports this position
16	Marine Management Organisation (MMO)	DCO (Marine Mammals)	1.1.6: The MMO recommends insertion of an additional sub-paragraph to confirm that all piling will cease if noise levels are significantly higher than those modelled and assessed in the ES, and will not restart until the Marine Mammal Mitigation Plan (MMMP) has been updated and the MMO grant permission for the activity to recommence. 1.1.7 Insertion of the following wording is proposed: ‘The results of the initial noise measurements monitored in accordance with sub-paragraph	Supports



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			<p>(2) must be provided to the MMO within six weeks of the installation of the first four piled foundations of each piled foundation type. The assessment of this report by the MMO will determine whether any further noise monitoring is required. If, in the opinion of the MMO in consultation with Natural England, the assessment shows significantly different impact to those assessed in the ES or failures in mitigation, all piling activity must cease until an update to the MMMP and further monitoring requirements have been agreed.'</p> <p>1.1.8 DML Schedules 13 and 14, condition 22 – Post-construction monitoring: The purpose of post-construction monitoring is to validate predicted impacts set out in the ES. Whilst the MMO notes the Applicant's intention to carry out post-construction surveys for up to 3 years, additional surveys may be required if the impacts of the project are found to exceed those predicted in the ES.</p>	
17	Marine Management Organisation (MMO)	In Principle Site integrity Plan (IPSIP)	2.5.1 MMO welcomes the inclusion of clearance of UXO in the In Principle Site integrity Plan (IPSIP), which is an appropriate place to detail the scale of potential noise impacts from the project on the Southern North Sea SAC. The MMO considers however that a more detailed Habitats Regulations Assessment of this activity should follow post-consent together with the submission of a detailed marine licence application for the required UXO campaign.	NE also welcomes plan. NE also awaits the MMO production of mechanism for controlling multiple Projects with cumulative effects.
18	Marine Management Organisation (MMO)	<i>Sabellaria</i> reef micrositing	1.1.9-1.1.11. The MMO notes that micro-siting does not appear to be mentioned in the context of mitigating impacts on <i>Sabellaria</i> reef in the draft Development Consent Order (DCO). However, we recognise that exclusion zones/environmental micro-siting requirements do form part of condition 17 in part 2 of DCO Schedule 13 and condition 13 in part 2 of	Supports



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			DCO schedule 14. These conditions are referenced in the Offshore Schedule of Mitigation, and MMO would like clarification of any 'impractical' mitigation plans and 'where practical' clearly defined	
19	Marine Management Organisation (MMO)	Mitigation	1.1.13 The MMO does not consider that the draft DCO (Chapter 3.1) and associated DML and licence conditions contain sufficient detail to adequately capture the mitigation options proposed. Further information required in DCO and DML for micro-siting, burial depth, landfall, cable burial, foundation scour and pile foundation types.	Supports
20	Marine Management Organisation (MMO)	Fish Ecology	1.1.14 The MMO agrees that the existing mitigation measures proposed for fish are appropriate and appear to have been captured within the DML conditions. However, there is a potential overlap in noise propagation from piling over parts of the Downs herring spawning ground which may mean that a seasonal piling restriction is needed and will need to be included in the DML conditions. Recommends that the Applicant undertakes pre- and post-construction sandeel habitat monitoring.	Supports
21	Marine Management Organisation (MMO)	Commercial Fisheries	3.5. The use of concrete mattresses and other methods to cover unburied cables or cable crossing points is also likely to be controversial as this presents a snagging risk to trawling vessels. These mattresses will be in addition to those in place along cable routes for other windfarms within the area.	Supports
22	Marine Management Organisation (MMO)	Arbitration	1.1.16 to 1.1.23 The MMO's position on arbitration has been set out in a number of recent Offshore Wind Farm Planning Inspectorate hearings and is repeated.	Supports



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23	Whale and Dolphin Conservation	Marine Mammals	<p>WDC recommend for East Anglia ONE North that:</p> <ul style="list-style-type: none"> • Foundations requiring piling are not used; • Further assessments are made on alternative foundations to fully understand the potential impacts on marine mammals, and prey species; • apply effective noise-reducing measures where piles of any sort are driven 	First point not commented on by NE. Last point supports NE comments
24	Suffolk County Council and East Suffolk Council	Onshore Terrestrial Ecology and Ornithology	Some ecological receptors which are either not considered to have been fully assessed or have insufficient mitigation/compensation measures identified within the Environmental Statements and secured within the draft Development Consent Orders (DCO). These include the impact on bats, hedgerows, woodlands and trees during construction and designated sites in relation to adverse impacts on air quality during construction. In addition to these areas the Councils are disappointed with the lack of commitment to biodiversity net gain.	Supports
25	Suffolk County Council and East Suffolk Council	Landscape and visual effects	The applicant has not fully understood the character and significance of the features and landscape elements of the substation site, especially in relation to the historic landscape character and therefore the Environmental Statement (ES) does not fully recognise the harm caused by the development. Concerns regarding substation infrastructure associated with both EA1N and EA2 and the impacts on landscape and visual amenity, heritage assets, noise and public rights of way. When taken together there will be a significant adverse impact in respect of the sensitivity of the receiving landscape, local residents and visitors.	NE comments relate to the area within AONB Only (excludes substation)
26	Suffolk County Council and East Suffolk Council	Substation	There are concerns in relation to the onshore substation infrastructure associated with both EA1N and EA2 and their impacts including on landscape and visual amenity, heritage assets, noise and public rights of way. When taken together there will be a significant adverse impact in respect of the sensitivity of the receiving landscape, local residents and	NE comments relate to the area within AONB Only (excludes



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			visitors. The mitigation proposals presented to date do not satisfactorily address these concerns.	substation at Friston)
27	Suffolk County Council and East Suffolk Council	Seascape Visual Impact Assessment	The in-combination impacts of the offshore wind turbines of both projects and the visual effects of EA2 alone, will result in significant adverse landscape and visual effects on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The Council recognises that the principal consultee in respect of the impacts of the development on the AONB and their significance is Natural England. However, the Council is seeking to meet its duties under section 85 of the Countryside and Rights of Way Act 2000.	Supports
28	Suffolk County Council and East Suffolk Council	Cumulative Impacts	The full cumulative impacts of the existing and potential future projects in the east Suffolk area have not been adequately assessed within the applications.	Supports
29	Suffolk County Council and East Suffolk Council	Coastal Change	Further information is necessary to demonstrate the proposed works do not cause local cliff destabilisation or damage to the subsea crag outcrop and revisions are required to the requirements to ensure that the detailed design of the works is submitted for approval before construction commences.	Seeking clarification that coastal damage does not occur. NE supports the submission of this post consent and has provided further comments at D1 on this matter.
30	The Wildlife Trusts	Marine Mammals	Concerns over cumulative underwater noise disturbance impacts on the harbour porpoise North Sea Management Unit and in-combination disturbance within the Southern North Sea SAC. Assessment methodology underwater noise management in the Southern North Sea SAC: TWT has	NE and TWT agree to disagree



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			concerns regarding the proposed SNCB advice. To understand the impact on the integrity of the Southern North Sea SAC, a site-based assessment based on an estimated population number is required rather than an assessment on the Management Unit.	
31	The Wildlife Trusts	Marine Mammals – MMMP and SIP	There are a number of outstanding issues which means that TWT cannot conclude that there will be no adverse effect beyond reasonable scientific doubt on the Southern North Sea SAC. Firstly, the SIP lacks detail and therefore in its current form it is not adequate. More detail should be provided on the effectiveness of the proposed mitigation as outlined in the SIP and MMMP, including referenced examples of how the implementation of mitigation will reduce underwater noise disturbance impacts within the Southern North Sea SAC. Noise modelling should also be undertaken to demonstrate the degree of noise reduction which could be achieved through mitigation. Secondly, we cannot conclude no adverse effect on the Southern North Sea SAC due to the lack of regulatory mechanism to manage in-combination underwater noise impacts.	Supports – In relation to TWT second point NE highlights need for regulatory mechanism as without there could be potential adverse effect. For their first point see NE's response to ExQ1. Fundamentally NE is satisfied that the SIP and MMMP has included all of the relevant/known information at this time and that they will be updated prior to



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				construction to reflect the then relevant thinking
32	The Wildlife Trusts	Marine Mammals - DCO – UXO Clearance	We welcome that the applicant has included conditions in relation to UXO clearance in the draft DCO and has committed to a UXO MMMP and SIP. There is inconsistency on the inclusion of UXO clearance in draft DCOs alongside associated mitigation documents. Due to the cumulative impact of underwater noise impacts from offshore wind farm development, UXO clearance and associated mitigation must be secured across all DCOs to ensure site integrity of the Southern North Sea SAC.	Supports
33	The Wildlife Trusts	Marine Mammals - Monitoring	Southern North Sea SAC. There is a great deal of uncertainty regarding the impacts of underwater noise on harbour porpoise in UK waters; very few studies have been undertaken. Generally, current monitoring included in Development Consent Orders for offshore wind farms is not fit for purpose to provide adequate information to confirm the effectiveness of mitigation methods. In addition, the monitoring included in the In-Principle Monitoring Plan is not fit for purpose for harbour porpoise or the Southern North Sea SAC. To provide more confidence, TWT recommends that all offshore wind farm developments should contribute funding and participate in the delivery of strategic monitoring. Developers all agree that a strategic approach to monitoring is the most effective approach but consistently highlight that a mechanism for delivery is lacking.	NE has provided further advice on this matter into examination
34	The Wildlife Trusts	Fishing -cumulative/in-combination	Fishing has not been included in any cumulative/in-combination assessments within any chapters of the application. As a principle, fishing should not be considered in any assessments as part of the baseline. It is a licensable ongoing activity that has the potential to have an adverse impact on the marine environment. Following the commencement of judicial review proceedings by TWT against Dogger Bank Offshore Wind farms, TWT was given assurances that fishing would be included in future	Noted



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			<p>offshore wind farm assessments. We have raised this issue with the Planning Inspectorate over several planning applications (Hornsea 3, Norfolk Vanguard, Norfolk Boreas) and have also raised the issue with Defra and BEIS. We make this case for all MPAs assessed in this application.</p>	
35	Suffolk Wildlife Trust	Onshore Ecology	<p>It is omitted that semi-natural broadleaved woodland is a UK Priority habitat under the classification Lowland Mixed Deciduous Woodland (Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). Applying the criteria in Table 22.8, this habitat is defined as ‘medium importance’ rather than being assigned to ‘high’ as would be the case for UK Priority habitats and this then has a bearing on impact significance. Consequently, we disagree that the loss of 1.1 hectares of semi-natural broadleaf woodland is ‘low’ for long term duration, with only a temporary residual impact of ‘minor adverse’ after mitigation. We note that the mitigation proposed includes the planting of replacement woodland to result in ‘no net loss of trees’ following the completion of the works, although planting of trees cannot be undertaken on the cable route itself. <u>We determine this planting is not mitigation and instead forms compensation under the mitigation hierarchy. Given our comments in the above paragraph, we consider the current measures proposed do not sufficiently address the impacts upon semi-natural woodland and that further compensatory habitat is required.</u></p> <p>The loss of hedgerows during construction will result in gaps of 16.1 meters for ‘important’ hedgerows and gaps of 32 metres elsewhere, with a worst-case scenario of more than 10km being lost overall. Whilst it is proposed that these hedgerows will be replanted as soon as possible post-construction, there will still be an ensuing period of at least 5-7 years until they re-establish, potentially longer depending on seasonal weather</p>	NE is aware of Ecological Enhancement Note in preparation and will consider this in our future comments



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			<p>patterns and an inability to prevent deer browsing. We are particularly concerned about the impacts upon foraging and commuting bats and that despite the implementation of the identified mitigation measures, it is stated that the temporary residual impact on this group cannot be reduced below “Moderate Adverse”. It is also stated that all hedgerows where barbastelle were recorded or which had a ‘high’ level of bat usage will be considered ‘Important’ for bats, however it is not clear how the mitigation measures identified will be implemented in these locations, other than reducing the amount of hedgerow removal to 16.1m. <u>Given the above we feel that the mitigation measures proposed do not provide a sufficient level of detail to ensure certainty of impacts on this group and we would expect to see a more comprehensive mitigation package.</u></p>	
36	Suffolk Wildlife Trust	Net Gain	<p>In combination with other development, this scheme represents a further severance of ecological connectivity within this part of Suffolk and we are not convinced that the current proposals offset this impact. Furthermore, whilst not obligated under NSIP, we would like to see an approach that embeds Biodiversity Net Gain, rather than simply ‘no net loss’.</p>	Supports
37	The Woodland Trust	Onshore Ecology	<p>The Trust would like to highlight Natural England’s Standing Advice regarding development bordering ancient woodland. It states: “For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone.” Once further information is submitted, the Trust can provide a more detailed assessment of the impacts posed. Furthermore, the Environmental Statement within the applicant’s submission for both projects refers to the presence of veteran trees (Chapter 22; Onshore Ecology).</p>	Issue not raised in NE RR, but we are supportive of the Trust on this matter



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38	Environment Agency	Onshore Ecology	<p>Environmental Statement considers the impact of the proposed works on watercourses and ponds, and the proposed mitigation measures in respect of ecology. We note the data in respect of fish populations, but would suggest that the timing of the works to avoid possible impacts on fish spawning should be a further consideration at the detailed stage. Document 7.2 states that all ecological mitigation measures in respect of watercourses will be secured within the Ecological Management Plan. We would wish to see all measures to mitigate impacts on the Thorpeness Hundred river (ecological, water resources and water quality), included within the watercourse crossing method statement prepared as part of the Code of Construction Practice.</p> <p>Water vole and otter surveys were undertaken during a prolonged period of uncharacteristically dry weather. As such, several watercourses that were not viable or utilised by these species during the survey period could be in the future, particularly following periods of wet weather. As specified, final surveys must therefore be undertaken before the commencement of any works.</p>	Supports
39	Alde and Ore Association	Landfall Cliff Stability	<p>The Association OBJECTS to the plans for bringing electric cables onshore from the Scottish Power Renewables windfarms. The proposed site for bringing the windfarm cables onshore hits what is recognised to be a dynamic and fragile coast at one of its most obviously fragile points. The cliff, which is geologically little more than a slightly hardened sand dune, lost over 20 feet in a single fall one night after battering by winter winds and a storm surge two years ago. Any tunnelling under the cliff from the sea bed will cause vibrations and lead to destabilisation of the sandy cliff land. Tidal swirls always occur where a slight indent in the coast appears exacerbating the erosion of the coast as has already happened to the cliff</p>	Issue not mentioned in NE reps as we aware of other projects where HDD has been successfully used. Please see our comments on



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			just south of the proposed tunnel. Strong wind and wave action, as well as being a coastline subject to significant North Sea surges.	D1 Appendix C2.
40	Suffolk Energy Action Solutions (SEAS)	Landfall Cliff Stability	Thorpeness Cliffs for landfall is not suitable due to the fragility of the Coraline Cliffs.	Natural England notes the concern and has advised that suitable mitigation will be required.
41	Suffolk Energy Action Solutions (SEAS)	Onshore Ecology	The construction will cut Suffolk Coast and Heaths AONB in half causing problems to migrating species and severing the wildlife corridor. Lost woodland will devastate the populations of badgers, red deer, invertebrates and other wildlife. Light pollution, Noise pollution, Air pollution and Suffolk's famous peace and tranquillity will be lost for ever with substations operating 24hrs.	NE highlighted onshore ecology issues in relevant reps.
42	Save Our Sandlings (SOS)	Sandlings SPA	This project for EAN1 and EA2 will drive cable routes the width of a motorway through the Suffolk Sandlings and this AONB landscape for 4- 8 years which is a timescale that cannot be described as temporary. Wildlife will be negatively affected long term and migration routes for birds and red deer will be cut in half. People will not want to live or visit here. There will be a very detrimental effect on the tourist industry. Minsmere bird reserve will be negatively affected in terms of visitors who often walked to Thorpeness or Aldeburgh as do other tourists. Footpaths, bridleways, and cycle paths will be closed for locals, tourists and visitors with a negative impact on the local economy. The massive substations themselves are totally unsuitable for the landscape around Friston or indeed this whole East Suffolk Coastal Area and will overwhelm this beautiful village for local people and tourists alike.	NE has provided further advice to our RR at Deadline 1 Appendix C3



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43		Landfall Cliff Stability	The cliffs at Thorpeness are crumbling and part of a disintegrating coastline - not suitable at all for cable landfall.	
44	Save Our Sandlings	LVIA	The siting of the project is flawed and solely based on inadequate and out of date national grid connections and no overall plan that takes into account the special qualities of this East Suffolk Landscape. The Secretary of State has promised an inquiry into this problem in Suffolk and Norfolk which will look into the possibility of a ring main or a hub out at sea as is used in other countries or at least the siting of these substations on suitable brownfield sites. This application should be turned down or at least halted until the results of this inquiry are known.	NE would support the consideration of alternative options, but can only comment on the impacts of the current proposal
45	SASES - Substation Action – Save East Suffolk	LVIA	3. Visual harm that cannot be mitigated, an absence of plans showing the scheme and Friston village together, questionable judgements regarding sensitivity and magnitude of change. The use of Suffolk County LCTs instead of more up to date LCAs from Suffolk Coastal and lack of justification for subdividing these LCTs. Lack of detail regarding significant infrastructure components e.g. the access road. Absence of viewpoints from the footpaths north of the site (e.g. showing relationship between the church and site).	NE comments relate to the area within AONB Only (excludes substation at Friston)
46	SASES Substation Action Save East Suffolk	Onshore Ecology	9. Onshore Ecology - The projects will involve the loss and disruption of habitat for badgers, bats, owls, great crested newts, adders and other wildlife.	Supports
47	SASES Substation Action Save East Suffolk	SLVIA	Light Pollution - There will be significant light pollution given the “dark skies” of the present rural environment both during construction (particularly at construction compounds) and operation.	



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48	Substation Action Save our East Suffolk (SASES)	Cumulative Impact	SPR has not properly addressed the impact of the developments with 5 other major energy projects in the same area, Nautilus, Eurolink, Galloper expansion, Greater Gabbard expansion and Sizewell C. There is a direct link between the proposals and elements of those projects in light of their likely grid connections.	NE supports a more strategic approach
49	Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership	SLVIA	1) The Landscape and Visual Impact of the scheme on the nationally designated AONB, including its setting. 2) The impact of the scheme on the defined natural beauty elements of the AONB, including landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage. 5) How the scheme and the developer has addressed its duty of regard to the purposes of the AONB. 8) The quality of and appropriateness of measures to avoid, mitigate and compensate for impacts on the natural beauty and special qualities of the AONB.	Supports
50	Suffolk Preservation Society (SPS)	LVIA	SPS's principal concern is the scale of the industrialising effect of the onshore substation within an area around Friston where its intrinsic rural character is defined by its historic landscape and buildings. SPS believes that a more creative and sympathetic design, and/or consideration of lowering the ground level, rather than adopting generic layouts would minimise some impacts. The detail provided within the Design and Access Statement and the Design Principle Statement is superficial.	NE comments relate to the area within AONB Only (excludes substation at Friston)
51	Suffolk Preservation Society	SLVIA	The visual impacts of the turbines upon the special qualities of the AONB will be significant, particularly with the cumulative impacts from EA2. Although the applicant has reduced the extent of the arrays they will continue to have a significant adverse impact on a nationally designated coastline and numerous coastal heritage assets. Consideration should be given to a height restriction to mitigate the impacts.	Supports
52	Trowers & Hamlins LLP on	Onshore Ecology	5.2 Grove Wood has been identified by Natural England as an area of ancient woodland and is on the boundary of the onshore development	NE recognises the potential for



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	behalf of Suffolk Energy Action Coalition (SEAC)		area. The ES does not include Grove Wood as a sensitive ecological receptor despite its proximity to the onshore substation. The ES is incorrect in its determination that there will be no change to Grove Wood. Due to the proximity to the onshore substation, Grove Wood will be subject to increases in dust and a decrease in air quality throughout the construction period. The air quality impacts on Grove Wood should be assessed as part of the ES and appropriate mitigation put in place.	ecological impacts within our RR.
53	Trowers & Hamlins LLP on behalf of Suffolk Energy Action Coalition (SEAC)	Habitats Regulation Assessment	6.1. The avoidance of the Southern North Sea SAC was not considered at all for the positioning of the offshore development, which is at odds with the many steps taken to avoid the siting of onshore infrastructure in protected areas. No justification has been given for this approach. The Applicant has not considered cumulative impacts associated with the Nautilus Interconnector. This is at the pre-application stage and is development reasonably likely to come forward. The Application should demonstrate a biodiversity net gain in order to offset other environmental harm, but fails to do so.	Avoidance not specifically commented on in Relevant Reps, but consider as first step in HRA.
54	The Crown Estate	Interested Party	Registered as an Interested party.	Not Relevant to NE
55	Office for Nuclear Regulation	Emergency Planning	ONR is seeking assurance from Suffolk County Council Emergency Planners that the proposed development can be accommodated within the existing off-site emergency plan for Sizewell B nuclear licensed site, from the Sizewell B operator that the development does not pose a hazard to the nuclear licensed site and from ONR inspectors that the appropriate external hazards posed by the development have been adequately considered and mitigated against.	Not Relevant to NE
56	NATS	Radar Detection	Depending on the exact height of the turbine tip, the potential is for half or all of the application site to be detected by NATS's Cromer radar. It is anticipated that the radar detection of the turbines will lead to substantial "clutter" appearing on Air Traffic Controllers' displays. Accordingly, the	Not Relevant to NE



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			anticipated impact is deemed to be unacceptable to NATS's operations and at this time, NATS objects to the application.	
57	Trinity House	Interested Party	Wishes to be a registered interested party due to the impact the development would have on navigation within Trinity House's area of jurisdiction. It is likely that we will have further comments to make on the application and the draft Order throughout the application process.	Not Relevant to NE
58	Maritime Coastguard Agency	Maritime Safety	The MCA would appreciate the opportunity to consider the project in line with our published guidance as per below, and to ensure that the Development Consent Order Deemed Marine Licence includes MCA's navigation safety conditions for all offshore renewable developments.	Not Relevant to NE
59	Historic England	Consideration of Heritage assets	Our concern is therefore to ensure that the Outline Offshore Archaeological Written Scheme of Investigation considers how the construction can be designed sensitively to take into account known and potential heritage assets.	NE welcomes this but as set out in our RR consideration between Archaeological and ecological constraints in the marine environment must be considered.
60	National Grid	Area Management	Comments on design of surface water management, licensing and DCO	Not relevant to NE
61	Public Health England	Public Health	Chosen NOT to register an interest with the Planning Inspectorate on this occasion.	Not relevant to NE
62	Suffolk Local Access Forum	Public Access	Require more detail as to the phasing and duration of any closures, particularly where several PRow's are close together and at the substation site as we are concerned that there could be closures and disruption of a	General comments



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			network of PRow all at the same time, leaving walkers with very limited or no access at all.	
63	Ramblers Association	Public Rights of Way impacts, onshore ecology and LVIA	Impacts to footpaths and rights of way from development, habitat recovery.	General comments
64	Anglian Water	Water Course Management	We anticipate having further discussions with the applicant about the need for diversions and/or crossings etc. of existing sewers as appropriate. Anglian Water is not aware of any water supply or wastewater requirements made upon them for the above project.	Not relevant to NE
65	EDF (NNB Generation Co Ltd) and EDF Energy Nuclear Generation Ltd	Sizewell C – Operational Elements	Consideration required for operational elements such as access, emergency planning.	Not relevant to NE
66	EDF (NNB Generation Co Ltd) and EDF Energy Nuclear Generation Ltd	Sizewell C – coastal protection and geology	The proposed SPR export cables would cross the line of the Greater Gabbard and Galloper cables before turning to the west and making landfall to the north of Thorpeness. The SPR cable corridor includes within it the majority of the Coraline Crag formation (calcareous sand rock outcrops). In relation to the construction and operation of Sizewell C, SZC Co. are particularly concerned that the protection afforded to the Sizewell shore by the Coraline Crag between Sizewell and Thorpeness should not be compromised. SPR have been made aware of the need to avoid potential disturbance to the Coraline Crag and associated seabed morphologies when considering actual cable routes, cable laying methodologies and subsequent maintenance requirements. Protective provisions should be included in the SPR DCO to ensure that, after SPR have carried out their detailed pre-construction surveys to determine the southern extent of the Coraline Crag formation, this is achieved in practice. Protective Provisions In the interests of nuclear safety and to ensure that	NE would support this consideration



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			the proposed developments do not affect the construction and operation of Sizewell C, SZC Co. will require provisions to be included within the DCOs for both wind farms.	
67	EDF (NNB Generation Co Ltd) and EDF Energy Nuclear Generation Ltd	Sizewell C - In combination effects	it is likely that construction of EA1N and EA2 would coincide with the construction phase of Sizewell C. SZC Co. acknowledges that the Environmental Statements submitted with both applications consider the in combination effects and SZC Co. has had a number of meetings with SPR to exchange environmental information and assist SPR in this regard. Co-operation with SZC Co. Given the nature of the proposed projects, we hope that SPR will continue to work closely with SZC Co. and other stakeholders on its more detailed proposals as it is vital that all the developments are coordinated through their respective planning and construction phases.	Supports
68	Innogy Renewables UK Limited	Interested Party	Register as interested party.	Not relevant to NE
69	Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited	Infrastructure	Network Rail considers that the Secretary of State, in applying section 127 of the Planning Act 2008, cannot conclude that new rights and restrictions over the railway land can be created without serious detriment to Network Rail's undertaking; no other land is available to Network Rail which means that the detriment cannot be made good by them. To safeguard Network Rail's interests and the safety and integrity of the operational railway, Network Rail objects to the inclusion of the Compulsory Powers and any other powers affecting Network Rail in the Order.	Not relevant to NE
70	Aldringham-Cum-Thorpe Parish Council	(S)LVIA	The extensive area of land required within the AONB, SSSI and Heritage Coast will change this beautiful landscape forever. Large scale developments in this location have the potential to significantly impact the fragile coastal margins, causing further cliff destabilisation, as well as removing many unique habitats which support numerous protected	NE Supports where statutory remit is within protected sites



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			species. It is unclear how these impacts will be minimised throughout the construction. The Developer must be required as a minimum to restore the cable route to its state prior to the construction. If not practical, significant mitigation should be agreed.	
71	Southwold Town Council	SLVIA	The reason for registering is to follow and support Natural England's concerns about the proposed developments. Southwold Town Council is supportive of the environmental advantages of renewable power but is concerned about the effect on the tranquillity and wilderness of the AONB seascape.	Supports
72	Aldeburgh Town Council	SLVIA	Concerns over tourism, economy, AONB and cumulative impacts.	General Comments
73	Benhall & Sternfield Parish Council	Infrastructure	The proposals do not demonstrate that the least disruptive technology is being used with respect to the on-shore installations. It is important to ensure that the routing of HGVs is maintained on approved lorry routes.	Not within NE statutory remit
74	Iken Parish Council	Cumulative Impacts and LVIA	Cumulative impact on local communities of up to seven energy projects occurring consecutively over 12 to 15 years - Use of unspoilt countryside at Friston for substation complexes of vast size - Noise pollution in an area of peace and tranquillity -impact on tourism the mainstay of the local economy	Friston is outside the AONB so not for NE comment
75	Theberton and Eastbridge Parish Council	Traffic and construction	The Parish Council is concerned regarding the potential cumulative impacts of construction HGV and other associated traffic on the B1122, from its junction with the A12 to Lovers Lane in Leiston.	Not within NE statutory remit
76	Middleton cum Fordley Parish Council	SLVIA, economy and tourism	We are deeply dismayed, not to say alarmed, that this application is being submitted for consideration with so little reference to, or allowance being made for, the combined impact of some six other projects planned in the very area covered by this DCO. There seems to be no regard being paid to the cumulative disruption that will be caused to the daily life of local residents, in terms of noise, air and light pollution, delays to all forms of traffic (including the emergency services). Nor is there due recognition of	NE support where comments relate to AONB and protected areas



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			the damage and destruction of the adjacent AONB and SSSI with their fragile environmental and ecological aspects and the inevitable erosion of this unique region's tourism.	
77	Snape Parish Council	SLVIA, Infrastructure	Noise and Light pollution, and substation	Substation is outside AONB – General comments
78	Knodishall Parish Council	Infrastructure, rights of way, cumulative impact	The local road into Knodishall from Black Heath Corner (B1069) is not suitable for the large volume of HGV's that will use this to enter the haul road, this is already heavily used by traffic going to the local Towns, holiday traffic to the coast and staff from the Sizewell sites, this is extremely heavy at the beginning and end of the working day. * The permanent and temporary closure of PRoWs there are many footpaths and bridleways that the cable route crosses, they are heavily used each day temporary routes need to be in place before the work starts. * The cumulative impact on the local communities of up to seven energy projects occurring consecutively over 12 to 15 years, this will blight the local area with so many large projects	General comments
79	Friston Parish Council	LVIA	Concerns over site selection, landscape, flood risk, heritage, noise, land use, human health, footpaths, human impact.	NE have commented where the cabling runs through the AONB
80	Friston Parish Council	Onshore Ecology	The projects will involve the loss and disruption of habitat for badgers, bats, owls, great crested newts, adders and other wildlife. • Four active badger setts will be destroyed at the substations site. • Bats are present at the site and along the cable route including the rare lesser horseshoe bat.	Supports



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81	Reydon Parish Council	SLVIA, LVIA, Cumulative Impacts	Reydon Parish Council is totally in favour of renewable energy, but want to see further consideration given to the proposed size of the turbines off this heritage coast and the impact they will have on the Suffolk Coast Heaths and ANOB. The PC also have concerns on the way the energy is to be brought onshore. The PC objects to the location of the proposed substation and associated development at Friston due to the scale of the impact on the community and environment and understand that there are alternatives for example - offshore hubs and ringmains. The PC are also very concerned on the cumulative impacts resulting from the uncoordinated development of these and other energy projects along the Suffolk Coast. In all regards Reydon PC agree with Suffolk County Council and Natural England's objections.	General comments
82	Campsea Ashe Parish Council	LVIA	Campsea Ashe Parish Council support the representations made by SASES and Friston Parish Council. The cumulative impact of up to seven energy projects in East Suffolk will have a detrimental human impact particularly through noise and light pollution, blight and community severance in many villages as a result of the traffic impact. There is no doubt that Friston and surrounds will experience the most negative impact of noise and light pollution with discernible increases in both impacting on the quality of life for residents. The detrimental traffic impact however will have a wider compass on the villages and countryside of East Suffolk.	NE have statutory concerns where the cabling runs through the AONB
83	Members of Public	Various	818 representations. Most feedback is due to the position of the substation at Friston, waiting for the BEIS review outcome before entering examination, cliff stability at landfall, effects on AONB and protected species impacts	