Appendix B

THE PROPOSED EAST ANGLIA THREE WINDFARM ORDER

Response of Suffolk County Council under Section 56 of the Planning Act 2008

Summary

1. Suffolk County Council (SCC) is supportive of the development, but has identified a number of key issues that it would like to see considered as part of the examination into this project. These issues and others are considered in more detail in the main report which follows.

Phasing

2. A key issue is phasing, both within the East Anglia Three project (noting the proposal for it to be either a single or two phase development), but also the interaction between East Anglia ONE, East Anglia THREE, and future projects.

3. The application describes an intention to look at opportunities to reuse infrastructure temporarily used for East Anglia ONE, for example the haul road and CCSs. This is generally supported because the construction and removal of these elements generates significant HGV movements. However the gap between the projects will be a key consideration as it is important for the cable corridor not to retain the characteristics of a construction site for an extended period of time.

4. Appropriate triggers will be needed to determine the circumstances in which temporary infrastructure could be retained for an extended period and the application does not adequately address this at the moment.

5. Similarly, if East Anglia THREE progresses as a two phase project, the same considerations apply to the period between the phases, which is estimated at 50 weeks in respect of the onshore works, but will be reliant on prevailing funding conditions so could deviate from that.

Substation

6. The substation at Bramford is a substantive piece of infrastructure, which must be adequately mitigated for. While the assessment submitted is reasonable there are a number of methodological issues that need to be resolved to ensure that the scale of the effects are properly recognised and represented.

7. The mitigation proposals are strongly linked to those for the East Anglia ONE substation on adjacent land. Officers are working with East Anglia ONE to ensure that the landscaping proposals for that project are also tailored to minimise the effects of the East Anglia THREE project.

8. Further work is needed to understand the impact of ash dieback (*Chalara fraxinea*) on the woodlands which currently help to screen the impact of the East Anglia THREE site, as their thinning or loss could significantly change the visual effects of the substation, which may mean that further mitigation measures are required.

Jobs and skills

9. The economic benefits in terms of investment and job creation are very much to be welcomed, but it is considered that further pressure will be placed on a labour market which is struggling to resource the construction sector at the current time.

10. The assessment submitted does not analyse the labour market and skills context of the area and is overly optimistic about the ability of existing skills and employment infrastructure to respond to the demands of the project. Further discussions with East Anglia THREE are required to understand how the initiatives developed in the Skills Strategy for the East Anglia ONE project can be complemented by further undertakings.

Main Report

Phasing

11. The East Anglia Array is a multiphase project being developed in an uncertain financial climate, which poses a number of consenting challenges particularly around the certainty/timing of successive phases of development.

12. SCC strongly supported the enabling role of East Anglia ONE in providing ducting for future phases, indeed insisting on a Requirement to require such an approach in that Order. The driving force behind that support derives from the desire to avoid a recurrence of significant construction activity along the cable corridor on a cyclical basis.

13. While the provision of ducts obviates the need for future trenching activities, significant traffic movements, which are a prominent local concern, originate with the construction *and removal* of the haul road and Construction Consolidate Sites (CCS). Consequently, in principle, we are supportive of the concept of retaining temporary infrastructure from one project to support the successive one.

14. However, this must be caveated insofar that there is no guarantee over the timing of future phases of development; East Anglia ONE is due to start construction in January 2017, while the Environmental Statement for East Anglia THREE suggests the project could start any time between 2020 and 2025. To further complicate this, that project might progress in two phases, with an estimated (but not secured) one year gap between them.

15. So while there are obvious construction efficiencies and reductions in impacts in some respects (for example traffic) by reusing temporary infrastructure, there comes a point when the retention of that temporary infrastructure for an extended period of time poses different challenges; in particular in terms of landscape/visual and ecological effects.

16. Given that a third of the cable route passes through the Suffolk Coasts and Heaths AONB and a further 20% through Special Landscape Areas, we cannot support a situation where those important landscapes become characterised by haul roads, laydown areas and disrupted landscape features, particularly hedgerows, over the long term. These are landscapes of considerable local and indeed national importance and are a key attractor for tourists.

17. Equally, as Document 6.1.23(7) *Assessment of Haul Road Remaining in situ Between Projects* indicates there are species, notably bats, that could be adversely affected by long term gaps in hedgerows.

18. Consequently, we seek a pragmatic and flexible approach to the retention of temporary infrastructure, where the assumption is that temporary infrastructure is retained to support future projects (and scaled to the needs of future projects), unless in our view, there can be no assurances over the prospect of the next phase of development coming forward in reasonable time and thus are able to direct that that infrastructure is removed in line with the reinstatement provisions in the DCO.

19. The East Anglia ONE Offshore Wind Farm Order 2014 includes Article 23 and Requirement 28 which are relevant to phasing. Article 23 requires that land temporarily used for construction should be returned to its owner in an agreed state (generally its previous condition) by the end of 12 months from the completion of those works which are permitted on that land, unless the owner agrees to the contrary. Where land is given up, all temporary works are required to be removed.

20. Requirement 28 requires land not incorporated into permanent works to be reinstated in accordance with the details agreed by the relevant planning authority within 12 months of the completion of the relevant stage of the connection works.

21. A similar Article 23 and Requirement 30 appear in the draft East Anglia THREE Order.

22. SCC supports these provisions, which contribute to our phasing objectives as outlined above, but notes that it will be important for there to be join up between landowners and the relevant planning authorities particularly where the state to which the land is reinstated is not “full”, i.e. not to its original state, but rather to an interim state, for example partial retention of the haul road for example. The Explanatory Memorandum (Document 3.2) explains how the East Anglia ONE works may be retained in a planning context, but doesn’t link this to the compulsory acquisition challenges (paragraphs 5.16 – 5.19).

23. As drafted, SCC considers that there is sufficient latitude in the EAST ANGLIA ONE Order to support the pragmatic approach we seek, and thus it does not need to be modified.

24. Similarly the provisions in East Anglia THREE are generally acceptable, with the exception of the omission of a need to notify the relevant planning authority of a commencement date for onshore construction works under Requirement 36 (see below).

25. However, we do query whether, for the sake of clarity, the East Anglia THREE DCO should make provision for it to formally adopt East Anglia ONE temporary infrastructure as associated development to the East Anglia THREE project if it becomes the user of them. I.e. the ownership of, and responsibility, for the EAST ANGLIA ONE haul road would fully transfer to East Anglia THREE on commencement of its use for that project. It would be then be clear from the relevant planning authorities’, and indeed communities’ view whose asset it is.

26. Requirement 36 gives the ability of the relevant planning authority to permit East Anglia THREE to use the temporary assets from East Anglia ONE for the purposes of its project. However, as noted above, whether this is acceptable will depend on the length of the interval between the completion of East Anglia ONE and commencement of East Anglia THREE. It would likely be

unacceptable for example to seek to retain the East Anglia ONE haul road for, at the extreme, seven years (say 2018-2025) before it is to be utilised again.

27. This similar principle of timing of commencement needs to be applied in relation to Requirement 11. As written, the Requirement only requires the applicant to notify the relevant planning authority of the intention to proceed in one or two phases, not when each would commence.

28. East Anglia THREE is more complicated than East Anglia ONE as there is the prospect of it being a two phase development, and SCC fully understands the rationale for this, but as with the inter-phase effects (East Anglia ONE – East Anglia THREE), the intra-phase effects (East Anglia THREE: Phase 1 – East Anglia THREE: Phase 2) need to be similarly managed.

29. While the Environmental Statement for East Anglia THREE states that there would be an 18 month gap between the start of Phase 1 and start of Phase 2 and thus perhaps a fallow 50 weeks between construction phases, this is not secured in the DCO and we would suggest there can be no guarantee of such a gap.

30. Therefore we would similarly wish for a mechanism whereby, at the completion of Phase 1 (at which point the land is proposed to be reinstated – see paragraph 441 of Document 6.1.5) the relevant planning authority is notified of the likely commencement date of Phase 2 and thus can make a judgement on whether it is more appropriate to allow the haul road to remain to support that phase. If the period is indeed 50 weeks it is likely to be preferable to retain it, not remove it and then replace it, which is what is currently proposed.

31. Consequently, we generally support the provisions of the Outline Temporary Works Reinstatement Plan (Document 8.16), with the exception of the need to insert trigger points where the relevant planning authority can make a judgement on the desirability of retaining the haul road or not, having regard to the range of impacts that would ensue and the views of the relevant land owners.

32. We would however note that any infrastructure retained between phases would need to be scaled to that required for future phases. For example, the Primary CCSs and secondary CCSs for East Anglia ONE may be up to 15,000m^2 and 10,000m^2 respectively (see Requirement 10 therein), whereas the East Anglia THREE project only requires Primary and Secondary CCSs of 3,600m^2 and 1,200m^2 respectively (Requirement 12).

33. Furthermore, there is likely to be a need to conduct monitoring to ensure that the conditions set out in Document 8.16 are being adhered to and that in particular mitigation measures for bats remain effective.

East Anglia THREE Development Consent Order

Interpretations

34. “Jointing Bay” would be a useful addition here

Article 9

35. Article 9 omits similar clauses to those which appear in the East Anglia ONE order and which read:

(2) The public rights of way specified in Part 1 of Schedule 3 (public rights of way to be temporarily stopped up) shall not be temporarily stopped up under this article unless the diversion route specified on the public rights of way plan is first provided by the undertaker, to the reasonable satisfaction of the relevant highway authority.

(3) The relevant diversion route provided under paragraph (2) shall be subsequently maintained by the undertaker until the re-opening of the relevant public right of way specified in paragraph (1).

Article 23

36. It is not clear that this Article fully reflects the potential of a two phase approach, nor fully aligns with the assumptions made in the Environmental Statement.

37. 23(3) refers to "the completion of the part of the authorised project", which one would interpret to being the completion of both phases. However some uncertainty must exist on the timing of the second phase of development, so for the reasons described above, there may be benefit in considering the release of land back to landowners between phases. Perhaps the removal of the haul road could be a trigger to return land to landowners between phases.

Article 39

38. It is not clear what is proposed to be varied in the East Anglia ONE Order. This is not explained in the Explanatory Memorandum (Document 3.2) either. Please see comments on Requirement 32 below.

Requirement 1

39. The development must commence within 5 years of the Order being made, yet the Environmental Statement suggests construction may not commence before 2025 (Document 6.1.5, paragraph 17). This does not tally.

Requirement 11

40. Please note the comment above over the relevant planning authority needing to be notified of the commencement dates of all phases for East Anglia THREE

Requirement 12

41. Part (3) links the design of the substation buildings to the Design and Access Statement (DAS) (Document 8.3). Much of the DAS is irrelevant in this context, and as such it makes more sense to link a 'Design Principles' document, as was done in the case of the East Anglia ONE Order.

42. There is no provision to control the size of the jointing bay compounds, which are assessed as being up to 3740m^2 (Document 6.1, paragraph 390).

43. There is no provision to control the extent of haul road built as part of the East Anglia THREE project, which has been assessed as 18.05km (Document 6.1, paragraph 368).

44. However, note the comment above that a haul road of up to 37km could become considered as Associated Development for East Anglia THREE, if it had been constructed by East Anglia ONE.

45. The maximum parameters of the CCSs are noted. If East Anglia ONE CCSs are used for East Anglia THREE they should be reduced to this size.

Requirement 14

46. This requirement suggests that landscaping management schemes are only relevant to the substation works, whereas they are also relevant to all the cable corridor works. The DCO provides for the land to be reinstated post-construction so it is important that this is in accordance with a set of landscaping plans that cover all the works.

47. This requirement should therefore mirror that in the East Anglia ONE Order and as currently written does not reflect the provisions of the Outline Landscape and Ecological Management Plan (Document 8.6).

48. Reference is also needed to link to the proposed Design Principles statement (see above) alongside the Outline Landscape and Ecological Management Plan.

Requirement 15

49. This requirement should also mirror that for East Anglia ONE. In particular 15(2) should differentiate between the care and maintenance period for the cable corridor (5 years) and the substation (10 years).

Requirement 18

50. Reference may need to be made to the East Suffolk Internal Drainage Board (IDB).

Requirement 22

51. There is some duplication between this requirement and others, for example 22 2(a) replicates 18(1) and 22 2(d) replicates 24 (1). It might be argued that 23 (1) and (2) sit better under Requirement 22 as the matters it seeks to control are construction effects.

Requirement 27

52. Experience from East Anglia ONE suggests that 27 (1) (c) may sit better with Requirement 16, indeed both requirements point to the same document.

Requirement 32

53. Part (1) needs to mirror that in Requirement 32 of the East Anglia ONE Order as it is through that Order the ducts will be installed and the effects of doing so have been assessed.

54. As such it is 25 years from the installation of the ducts that remains relevant (as acknowledged in (1)(a) not from the completion of Works 5B and 7. Therefore the words “or 2043, whichever is the earlier” need to be inserted after “Work No.7”.

Requirement 36

55. As noted above, this requirement should make reference to the need to provide the relevant planning authority with a date of commencement for the East Anglia THREE project.

Schedule 3

56. Please see comments under Public Rights of Way (PRoW) below, outlining the need for some amendments to this Schedule to differentiate between PRoW which are proposed to be stopped up with and without alternative routes provided.

57. More generally, SCC wishes to consider further with the applicant the extent of stopping up proposed as it is unlikely the extent shown here will be necessary and rather management measures could be used at a number of locations to maintain safe access.

58. Note that the page numbering in the DCO goes awry in this Schedule, the first page of which is p50, but this follows p62.

Deemed Marine Licences

59. It is explained in the Explanatory Memorandum (paragraph 4.6), that the DMLs have been split into six separate licences "to provide for a situation where generation, transmission or interconnection assets in each phase (should the project be constructed in phases) will be held by different companies post-construction".

60. This suggests that if the project proceeds in two phases, the onshore transmission assets for each phase may ultimately be owned by different companies.

61. SCC would like to understand better what implications there are, if any, of the first phase being constructed and passed to a different company, while the applicant is yet to construct the second phase and similarly whether the DCO also needs to reflect the possibility of two owners of the onshore infrastructure.

Landscape and visual effects

62. The applicant appears to have carried out a reasonably effective assessment. However there are a range of issues that need to be resolved.

East Anglia ONE - substation

63. The acceptability of the impacts of the substation is dependent on the design and quality of the landscaping and planting required as part of the EAST ANGLIA ONE DCO. The relevant requirements are yet to be discharged, and these matters remain under discussion, however we note that the East Anglia THREE application has made a number of assumptions about the final landscaping scheme for East Anglia ONE, which are not yet agreed with the local authorities.

64. For example, the Landscape and Visual Assessment (Document 6.1.29) at paragraph 48 states "*The* mitigation *planting to the south-west would be set on a 5m high bund and to the east on a 2m bund, which would add to the relative height of the trees*." And paragraph 50 then takes this information, combines it with growth rates of trees/shrubs to be planted on those bunds to hypothesise

future baseline conditions. It is assumed this is the situation modelled in the photomontages.

65. SCC recognises this is rather a complex situation due to the interrelationship between the East Anglia ONE and THREE projects, complicated by the lack of clarity over the final proposals for East Anglia ONE, which includes mitigation from which East Anglia THREE benefit. However, we do not wish our consideration of the most appropriate mitigation scheme for the East Anglia ONE project to be prejudiced by assumptions made during the consenting of East Anglia THREE. We anticipate that the relevant requirements in the East Anglia ONE DCO will be discharged in summer 2016, so the Examining Authority can be updated at the relevant time.

East Anglia ONE – haul road

66. The application includes an assessment of the landscape and visual effects of the retention of the haul road and associated infrastructure (Appendix 29 (5)) between completion of the East Anglia ONE project and commencement of East Anglia THREE. Whilst this proposal appears likely to be acceptable in landscape terms, further discussion is required on the necessary triggers for its retention/removal (as discussed above).

67. It does not appear that impacts of this retention option have been assessed in relation to other matters, for example land use (agricultural operations).

Presentation of visualisations

68. In one of the photomontages the location of the buildings shown appears to be incorrect and, more generally on the photomontages, the labelling of 'visible features' does not appear to be consistent.

69. It would also have been helpful (if not necessary) to the general reader if in presentations showing the mitigation planting in place, the project year was stated on the visualisation.

70. In other respects the presentation of the material appears to be in accordance with current best practice although the use of "computer model visualisation" is not as readily accessible as wireframe on a photograph to the general reader.

The sensitivity of receptors

71. The sensitivity of the same receptors (in particular of visual receptors around the substation site) has been set lower levels than for the assessment work carried out in respect of East Anglia ONE.

72. It is understood that the contention of the applicant (Document 29.1, paragraphs 63-67) that this relates principally to the changes in methodology that have taken place in the interval between the two assessments being carried out.

Magnitude of change

73. The methodology (Document 6.1.29(1) paragraphs 5-6) explicitly deviates from the current guidance on Landscape and Visual Impact Assessment in respect of the calculation of magnitude of change.

74. Whilst the current methodology states that the size or scale of the effect, its geographical extent and its duration and reversibility should be combined to calculate the magnitude of change, the applicant has chosen to deviate from this focusing on size and scale to calculate magnitude of change while

reporting, but not including geographical extent or duration in this calculation, but rather describing them separately.

75. It is understood that the contention of the applicant is that combining all three considerations in one rating can distort the aim of identifying significant impacts in respect of large scale developments.

Ash Dieback

76. The application material places significant reliance on existing woodland to screen the proposed converter station. However, the likely impact of ash dieback (*Chalara fraxinea*) on these woodlands, and the consequent loss of screening, has not yet been evaluated. Discussion with the applicant is ongoing on this matter.

Aftercare and monitoring

77. A mechanism is needed to resource the aftercare inspections for the works which could be a significant burden on the local authorities.

Seascape and Landscape Baseline (Document 6.3.29(2))

i. The character of the landscape

78. Agricultural landscapes are part of the character of the AONB and the wider countryside around and within the project area. The variation across the county between these landscapes is based principally on the variations in soil type and drainage. This has led to the consequent variation in land use, which has and continues to shape the variations in the landscape across the Suffolk.

79. Paragraph 50 - It should be noted that agricultural landscapes are a component of the character of the Suffolk Coast and Heaths AONB rather than a detracting feature in their own right as is implied here. It is the presence, absence, or condition of characteristic features in these “agricultural landscapes” that detract from the AONB.

ii. The character and special qualities of the AONB

80. Paragraph 23 - The landscapes used in the Suffolk Coast and Heaths Management Plan are a simplified form of the detailed Suffolk Landscape Character Assessment typology, used to provide a simple thumb nail sketch of the AONB landscape.

81. Paragraph 50 - “Erosion detracts from the scenic quality of coastal views” - these coastal processes are part of the character of this landscape and a normal process of change and not a visual or landscape detractor.

82. Subsequent to the LVIA for this project being carried out by the applicant, the character and Special Qualities of the AONB have been formally set out and published in relation to a separate project, but are applicable to the AONB as a whole and follow the recognised Natural England format. This information can be found at

http://www.suffolkcoastandheaths.org/planning-and-undergrounding/sizewell-c-developments/

iii. The Local Landscape Characterisation

83. For avoidance of doubt, as the citation does not appear to be clear in the application material, the Suffolk Landscape Character Assessment was first published in 2008 and revised with guidance and other additions in 2011. This

work was joint project between SCC and District Authorities. Details can be found at www.suffolklandscape.org.uk

Substation Assessment (Document 6.3.29(4))

84. The assessment identifies significant landscape and visual impacts in the long term (20 years) both for the operation of this project and cumulatively with the "future project".

85. As noted above, it is important to recognise that the mitigation of significant effects within 20 years is dependent on the successful implementation and maintenance of the planting scheme for the EAST ANGLIA ONE project (the relevant requirement in respect of EAST ANGLIA ONE has yet to be discharged) and the continued health of existing woodland blocks (the impact of ash dieback on these has also yet to be resolved). This is recognised in the Design and Access Statement (Document 8.3, paragraph 31).

86. It should be noted that the off-site planting in the EAST ANGLIA ONE section 106 Agreement is also important for the acceptability of the East Anglia THREE proposal.

Assessment of onshore cable route (Document 6.3.29(3))

87. Paragraph 17 - "designation of AONB relates directly to the constituent LCT's" - this is not the case as the LCT's post-date, by over 30 years, the designation of the AONB - however the LCT's do capture to some extent the character and special qualities of the designated area.

88. The sensitivity of the Suffolk Coast Path should be "High" throughout given that it is a nationally promoted route within a nationally designated landscape and the users of which have high expectations and sensitivity in relation the visual amenity of the landscape.

Outline Landscape and Ecological management Strategy (oLEMP) (Document 8.6)

89. This document is acceptable in terms of landscape issues, having been based on the document prepared for the EAST ANGLIA ONE project and subject to detail review during the pre- application process.

Ecological effects

90. SCC has two main concerns that it would wish to see discussed further.

Impact on skylarks

91. The impact on skylarks has not been mitigated (based on the 2012 Breeding Bird Surveys (see Fig 24.12.3, Sheet 22 in Doc 6.3.24 (1))). The Environmental Statement indicates that 1-2 pairs will be displaced by the substation site and associated planting.

92. The development would result in a permanent loss of habitat for skylarks, which are a Priority Species, and therefore, in accordance with paragraph 5.3.17 of NPS EN-1 which requires that the ExA/SoS should ensure that species and habitats of principal importance "should be protected from the adverse effects of development by using requirements or planning obligations", SCC believes this loss should be compensated for.

93. Although this is accepted as not being a significant impact in EIA terms, SCC has successfully secured a planning obligation in respect to a similar situation

in association that being the granting of The Progress Power (Gas Fired Power Station) Order 2015.

Retention of the haul road between phases and projects (Document 6.3.23(7))

94. SCC remains concerned over the potential impact of long term retention of the haul road on bats and in particular the adequacy of mitigation to ensure that the impacts are properly controlled. Any further evidence that the applicant can provide to show that such measures would be effective would be welcomed.

Outline Landscape and Ecological management Strategy (oLEMP) (Document 8.6)

95. The draft OLEMS has successfully transposed all the ES requirements except *Appendix 1 Hedgerow Schedule* refers to important hedgerows with "greater than" 1 pass of Barbastelle rather than "at least" 1 pass.

96. Paragraph 192 – bird nesting season should refer to March to August inclusive.

97. Paragraph 115 – should refer to Little Blakenham Pit SSSI.

98. SCC considers that Natural England rather than SCC should be responsible for checking Protected Species surveys.

Archaeological effects

99. The cable corridor for East Anglia THREE largely follows the same route, and uses the same land, as that for East Anglia ONE. In advance of East Anglia ONE, this corridor has been archaeologically evaluated. Extensive and significant archaeological remains were identified during this process, as a result of which SCC Archaeological Service (SCCAS) and Historic England have recommended a programme of archaeological mitigation, including several large areas of excavation, to be undertaken in advance of the start of works.

100. SCCAS understands that the consent for East Anglia ONE includes the totality of the land required for undergrounding of cables for both East Anglia ONE and East Anglia THREE, and bases its advice on this understanding.

101. The only additional area identified for East Anglia THREE is the site of the proposed substation adjacent to the National Grid substation at Bramford. This area was archaeologically evaluated separately from East Anglia ONE. The results of these investigations were inconclusive, although they did demonstrate low potential for extensive archaeological remains.

102. However, archaeological evaluation undertaken as part of East Anglia ONE immediately south and east of the East Anglia THREE converter station site, identified a number of features of archaeological interest, including undated ditches and pits, and further pits of Late Iron-Age date. This suggests that there is potential for discrete features of later prehistoric or early Roman date within the area of the substation. Any groundworks associated with the proposed development have the potential to damage or destroy any archaeological remains that may exist.

103. SCCAS, therefore, recommends that groundworks associated with the proposed converter station, including preparation of the site, are archaeologically monitored to ensure that any heritage assets that may exist are appropriately investigated and recorded. In order to ensure that the understanding of the significance of any heritage asset encountered is

advanced and recorded an appropriate requirement is necessary and the draft Requirement 20 is acceptable.

104. The outline Written Scheme of Investigation (WSI) (Document 8.4) meets the requirements of SCCAS as an overarching WSI. Further detailed WSIs will be required (to sit underneath this document) for specific phases of work. These documents will need to include details of contracting staff, timescales, specific methodologies etc. and include plans showing the areas of archaeological investigation.

Water resources

105. SCC as the Lead Local Flood Authority is content with the assessment presented in the application. SCC would be responsible for issuing Land Drainage Consents where works affect an ordinary water course which is not in the control of the East Suffolk Internal Drainage Board.

Schedule of Water Crossings (Document 6.3.21 (5))

106. This does not list who the consenting body would be: EA, IDB or SCC for the respective crossings and this would be helpful.

107. From SCC perspective, if there is already a duct in or under a watercourse and it is intended to use it for additional cabling, so long as there isn't a new crossing, consent would not be required.

Sustainable drainage

108. We note that Table 21.3 in Document 6.2.21 the intention to limit run-off at the substation through infiltration techniques, but note that the ground conditions will make this challenging and that attenuation ponds are likely to be necessary.

109. This issue needs to be approached with careful consideration and understanding of site conditions and the current and future behaviour/volume of surface water having regard to ground conditions, site topography (which will change through remodelling) and land cover (including the access road).

110. We would note that regard must be hard to the current guidelines on SuDs, which have recently been updated and suggest that a single treatment stage is likely to be insufficient.

111. We welcome the commitment in Table 21.3 to explore synergies with the principles and provisions of the Outline Landscape and Ecological Management Strategy (Document 8.6). We also consider that looking at a site wide solution at Bramford encompassing the East Anglia ONE, THREE and future projects would be sensible.

Flood Risk Assessment (Document 6.1.21(2))

112. The FRA is very general, and a specific Drainage Strategy will need to be designed, submitted and approved which reflects both local and national policy/guidance. Reference should be made to SCC's Flood & Water Management guidance which can be found here: https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/

Surface Water (21.2.7.3)

113. Paragraph 34 - Figure 21.2.2 is incorrect and the predicted Surface Water Flood Map should have been requested and provided by SCC Flood & Water Team.

Substation(s) Compound (21.2.10.1): Surface Water (2.2.10.1.1)

114. Paragraph 53 - The applicant needs to confirm the "lifetime of development" as this will impact the climate change value to be used. This is due to changes nationally how climate change percentages are calculated.

115. Paragraph 54 – bullet point 4 should be amended to read *"Filtering out pollutants via treatment stages; and"*

116. Paragraph 55 – The applicant will have to demonstrate, using infiltration testing to BRE365, that infiltration will work on any of the development area.

Requirements

117. Notwithstanding the above, we are content that Requirements 18 and 22 provide sufficient opportunity for us to ensure that flood risk does not increase as a result of the development.

Coastal matters

118. Suffolk Coastal District Council is the Coastal Protection Authority, but SCC offers the following comments.

119. The Environmental Statement (Document 6.1.5) states that the transition bay compounds constructed as part of Work 5b will be approximately 180m from "the top of the cliff" (paragraph 340). The top of the cliff is moving and will have done so significantly by the start of construction. Greater clarity would be beneficial and consideration should be given as to whether more precision should be added to the DCO on this point.

120. Document 6.1.5 refers to "the regulator" being the determining authority as to whether the cable should be left in situ or not (paragraph 356). This should rather be Suffolk Coastal District Council, the Coastal Protection Authority.

121. Monitoring provisions are likely to be required in the East Anglia THREE DCO to mirror those in the East Anglia ONE (Condition 10(i) of the Deemed Marine Licence). The Consultation Report (Document 5.2(38), paragraph, p133) states that the provisions in the East Anglia ONE DCO in relation to monitoring coastal change are sufficient for the East Anglia THREE project, but SCC would query whether this is appropriate given these will be two separate projects, potentially under different ownership (once transmission assets have been transferred to an OFTO) and so each party needs to be held responsible.

Public Rights of Way (PRoW)

122. SCC considers that the assessment undertaken is generally adequate, although there is an issue with the terminology used and also with some contradiction between text and the DCO and associated plans as to what is intended.

123. The comments below are based on the information in:

- Document 2.6 – Temporary Stopping of Public Rights of Way Plans
- Document 6.1.22 – Land use chapter of the ES
- Document 6.2.22 – Figures that support Document 6.1.22

- Document 6.3.22 (2) – Land Use Data Tables
- Document 6.3.27 (5) – Construction material quantities and associated HGV demand (single phase)
- Document 3.1 – Development Consent Order
- Document 8.1 – Outline Code of Construction Practice
- Document 8.3 – Design and Access Statement

Terminology

124. Terminology in the documentation needs to be clarified as the word “diversion” has a legal meaning which suggests a permanent arrangement. It is preferable to use the phrase “temporarily stopped up and alternative route” provided.

125. For example paragraph 133 (Document 6.1.22) should consider alternative phraseology where the last sentence concludes in the word “diversion” and similarly paragraph 138 uses the word “diverted”.

Clarity/consistency

126. Table 22.2.3 in Document 6.3.22(2) lists the PRoW and the extent of their interaction with the works. It is not clear how the figures provided for HGV movements in Table 22.2.3 relate to those presented in Document 6.3.27(5) which calculates HGV demand through each Access point .

127. As an example Table 3a suggests 242 HGVs (484 movements) using access A are needed to complete a single phase development. This seems to be significantly more than that suggested in Table 22.2.3 passing through Access A.

128. The column “Diversion Required” in Table 22.3.2 also leads to some confusion, particularly when read alongside the DCO.

129. While a ‘Yes’ indicates that the PRoW needs to be temporarily stopped up and an alternative route is to be provided, it is apparent that a ‘No’ in this column is ambiguous, it either means;

    a. The ProW is proposed to be stopped up and no alternative route is to be provided, for example, or

    b. The PRoW is not affected by the development and therefore does not need to be stopped up or an alternative route to be provided.

130. The final column “Extent of Interaction” then describes how the PRoW interfaces with the development and, if there is a ‘Yes’, in the preceding column, how that alternative route will be provided, although not consistently so.

Development Consent Order/Document 2.6

131. The DCO, in Schedule 3 “Public Rights of Way to be temporarily stopped up” lists all PRoW to be stopped up, not differentiating between whether an alternative route is to be provided or not, as established, albeit not entirely clearly, in Table 22.2.3.

132. Our recommendation is that Schedule 3 should be split in the manner that Schedule 3 is split in the East Anglia ONE Order – that being a Part 1 “Rights of

way for which a replacement will be provided during stopping up" and a Part 2 "Rights of way for which no replacement will be provided during the temporary stopping up".

133. As written, the DCO provides powers to stop up temporarily a large number of PRoW without an alternative being clearly provided.

134. We would recommend that Document 2.6, to which Schedule 3 is tied and which shows where PRoW will be temporarily stopped up, is updated to also clearly mark where an alternative route will be provided, reflecting the commentary in the column "Extent of Interaction" in Table 22.2.3. The alternative route need not be an alternative PRoW, but could be provided by the applicant within the Order limits.

135. Document 2.6 currently uses the terminology:

- Public Footpath/Bridleway/Restricted Byway to be temporarily stopped up
- Public Footpath/Bridleway/Restricted Byway to be temporarily diverted

136. We would prefer:

- Public Footpath/Bridleway/Restricted Byway to be temporarily stopped up with no alternative provided
- Public Footpath/Bridleway/Restricted Byway to be temporarily stopped up with alternative provided

137. This corrects the terminology issue with use of the term 'diversion' and would align with the suggested revision to Schedule 3 of the DCO – which as discussed does not differentiate between where an alternative is and is not proposed to be provided.

138. Document 2.6 would also benefit from marking on the access points A-AL (which Table 22.2.3 uses to order/reference the PRoW) and the location of the jointing pits and haul road as show in Figures 22.6a-g – which better illustrates to the reader why a particular PRoW needs to be temporarily stopped up.

Extent of temporary stopping up

139. Notwithstanding the above, the only locations where SCC would expect a temporary stopping up to be required would be where the haul road runs along/across a PRoW and it is deemed unsafe for the HGV and public to share it.

140. Given the levels of vehicular movements involved (as shown in Table 22.2.3 – but which need to be verified), generally, our expectation is that formally stopping up the PRoW will be unnecessary and rather management measures can be used to ensure safety.

141. Indeed this is the also the strategy described in the Environmental Statement: Paragraph 132 states:

Once the haul road is installed across the PRoW, further management measures (i.e. signage) would ensure that haul road users are aware of the potential for PRoW users to cross their path, and PRoW users are aware of the hazards to allow both to operate together safely.

142. Though we would add, that even during construction of the haul road across a PRoW, it could be possible to provide safe continuity of access.

143. There are apparently few locations where it seems unlikely safe access can be retained during the works, one example being Bridleway W-155/002/0 where there are proposed to be 112 HGV movements per day at peak (Table 22.2.3).

144. Where a temporary stopping up is required/provided for in the DCO, an alternative route should ordinarily be provided. We could not support the temporary stopping up of important PRoW for an unsecured period of time without an alternative route being secured. One example would be E-388/016/0 which is part of the popular Martlesham Circular walk.

145. There appears to be some errors/omissions in Table 22.2.3 which prevent us from taking a definitive view at this point about the likelihood of the need to temporarily stop a PRoW. For example:

    a. Apparent misalignment with HGV figures provided in Table 3a of Document 6.3.27(5)

    b. in the case of E-388/016/0, the proposed 'diversion' is described as being parallel to the existing PRoW, but at this point the PRoW is perpendicular to the haul road so this doesn't appear to make particular sense.

    c. it is not clear why the HGV movements through Access P are not the same across each of the PRoW. The average daily flow of HGVs leaving cycle Regional Route 41 (Waldringfield Road) is 37.3, with a similar number crossing/using PRoW E-388/046/0; E-388/045/0; E-388/016/0, but only 18.7 crossing E-388/044/0, which must be used to access E-388/046/0.

146. Further discussions are required with the applicant to clarify the PRoW proposals having regard to the issues identified above and SCC will update the Examining Authority in due course.

Outline Code of Construction Practice (Document 8.1) and Design and Access Statement (Document 8.3)

147. SCC supports the approach set out in paragraph 63 of the CoCP and paragraphs 71-73 of the DAS; that being where the haul road intersects a PRoW, no temporary stopping up would be required, management measures could be used. Furthermore, where a PRoW is also a point of access (for example a farm track is also a bridleway), if a temporary stopping is required due to the level of movements, any temporary stopping up should be kept to the minimum duration possible and an alternative route should be provided. However, this is not quite what is articulated through the DCO and supporting plans, as set out above.

Traffic and Transport

Transport Assessment (Document 6.1.27) and Outline Travel Plan (Document 8.8)

148. The Transport Assessment (TA) refers to an assessment based upon a minimum car share ratio of 2.5, which is considered ambitious. The analysis of travel surveys from the Sizewell B Dry Fuel Store scheme is of interest. This noted that "those car sharing tended to be gangs who knew each other beforehand and travelled to work as a gang, sharing the same local bed and breakfast accommodation." It wasn't clear how many people shared a vehicle but it was mostly cars. The analysis showed an aggregated car share ratio of 1.14 to 1.27. This comparison is considered more relevant than those used in the TA, namely Heathrow's Terminal 5 given its local relevance.

149. The TA emphasises the importance of an effective travel plan; the ambitious target set for EAST ANGLIA THREE cannot be considered a worst case scenario as suggested in paragraphs 116 to 118.

150. Recognising the Outline Travel Plan (OTP) proposal will rely on mini buses to deliver the 2.5 minimum figure, paragraph 91 of that document makes reference to pick up points from the A12 and A14 at locations to avoid impact on key junctions. This statement does not recognise the limited number of locations to facilitate this ambition and thus the effectiveness of this approach is therefore not currently accepted.

151. To achieve the ambitious car share equivalent of 2.5, detailed information on monitoring and enforcement is needed. The OTP refers to managing the on-site parking facility and monitoring the local area. It is recommended that this is enhanced with monitoring workers accessing the site by foot/cycle with information on their point of origin to further inform action.

152. Section 2.10.3 refers to three stages of enforcement, with an implementation time provided for the outcome of stage 2; however no information is provided on the time for each stage of the process, which could lead to a significant delay in dealing with off-site parking issues - further detail and assurance is required.

153. Although cycling is not considered significant, it is identified for access from North Ipswich. Although the OTP references a cycle distance of 8km, SCC considers 5km more appropriate and has identified this in the council's Local Transport Plan.

154. Levels of cycling along rural roads, particularly during the winter are unlikely to be high and the influence of lighting on behaviour is not considered. The OTP recognises that trips by rail would need to be multi-modal and an early comment refers to minibus pick up for rail trips, it should be noted that there are limitations for carrying bikes on trains and therefore any rail trip is likely to require minibus pick up.

155. The TA has assumed this minimum car share ratio, even for the sensitivity testing associated with the workforce distribution. Therefore without more certainty about the delivery of this plan, it is recognised that the impact of workforce trips to the primary CCS may have greater impacts than currently identified.

Road safety mitigation

156. SCC notes the proposals in paragraphs 195 – 201. Link 19, 21 and 27

- Link 19 some localised road widening and TM at the narrow point has been agreed for the East Anglia ONE proposals and it is expected that East Anglia THREE would inherit the road widening and do similar traffic management at the narrow point.
- Link 21 - localised temporary 30mph speed limits are proposed but it is not clear where they are - just at the accesses or over a longer length in which case concerns about compliance might arise. Some further clarification is required.
- Link 27 – the proposal to limit the timings of HGV movements is acceptable.

Sensitivity test

157. Section 27.6.4.6.3 identifies that further work will be required to assess the impact on specific junctions following consent and the appointment of the contractor. Assurance needs to be given that this assessment needs to be undertaken, agreed and implemented prior to commencement of works and that sensitivity testing will be needed to assess the impact of non-delivery of the minimum car share ratio.

158. It is noted that a high level assessment of impacts for Lowestoft Port have been included; this will need a more detailed review once the port to be used has been confirmed.

159. Throughout, the assessment has been based on the 1993 Guidelines for the Environmental Assessment of Road Traffic, this reference is considered out of date, having been superseded by WebTAG guidance.

160. Additional comments:

- Table 27.8 – the lack of a footway on Paper Mill Lane should be noted
- Table 27.11, p32 - it would help if the column “incorporating the towns of” allocated each link was the same as in Table 27.12, i.e. link 5 includes Colchester.
- Paragraph 146 - temporary speed limits seem to be the first choice. These will not be effective without other measures (see below).
- Paragraph 148 – omits reference to links 3,14 and 16.

Lower Road, Westerfield

161. This road is identified as Link 39 in the transport assessment (Document 6.1.27). Table 27.8 records this link of being high sensitivity due to its close proximity to residential properties. The Link can be seen in Figure 27.6 in Document 6.1.27(a). Figure 27.3 indicates that this road is to be used as the route from the B1077 (HGV Distributor Route) for traffic heading towards access AD.

162. This link is expressly forbidden for vehicles linked to the construction of East Anglia ONE and we believe this should also be true for East Anglia THREE. Indeed it is already signposted as “Unsuitable for HGVs”.

163. Our preference is that traffic heading towards access AD, should, upon heading north from the A1214, use Henley Road, and not route via the B1077, then Lower Road and then on to Henley Road. However, with the use of the southern stretch of Henley Road we would require a commitment for HGV vehicles to avoid school pickup/drop off times (this principle is captured in the Outline Traffic Management Plan (Document 8.7, paragraph 42)).

164. Our reasoning for such an approach is that:

a) SCC has worked for several years with Westerfield Parish Council to reduce the impact of east-west-east traffic through the village – a lot of this traffic is through traffic using Lower Road as a commuter rat run across the north of Ipswich. SCC is just about to install two fixed Vehicle Activated Signs (VAS) and enhanced gateway features. Use of Lower Road for East Anglia THREE would be counter to the strong feelings within the village to deter traffic on this route;

b) While there are a few localised points of conflict on Lower Road, there are none on Henley Road. Any point of conflict is an accident waiting to happen and an unacceptable risk; and

c) The junction of Lower Road with the B1077 is problematic – leaving Lower Road the visibility is severely restricted looking south by a property on the corner and is partially restricted looking north by a curve in the road. Slow moving HGV's leaving Lower Road would be a hazard to traffic on the B1077.

Outline Traffic Management Plan (Document 8.7)

165. Table 1 - reference should be made to say that the B1078 west of Ashbocking will not be used by construction traffic.

166. Confirmation is also needed that Paper Mill Lane will not be used by any construction traffic south of the accesses at the northern end, and no construction traffic to pass through Sproughton.

167. Table 2 - reference is made to Accesses AH and AI located being directly off a HGV distributor route. That is not true; the B1113 is rather a Local Access Lorry Route, but this should not cause a problem.

168. Paragraph 56 makes reference to highway condition surveys, which SCC supports and would wish to agree the locations for the use of a deflectograph at the earliest opportunity.

169. The Figures associated with this document (Figures 6, 75-79) refer to the use of Lower Road Westerfield, which as noted above, we do not support. Figures 75-79 also appear to omit points of conflict that would exist if traffic was routed on that road. The Figures also do not appear to show a *westbound* low loader swept path analysis for Lower Road.

Outline Access management Plan (Document 8.9)

170. Paragraph 31 - reference is made to a design speed for visibility of 50kph (31mph) being assumed for a 30mph speed limit. This is not accepted. In 30mph speed limits the mean speeds are often above this value.

171. Also, the Department for Transport document TD9/93 suggests a design speed for a 30mph speed limit should be 60kph. It is suggested that where the OAMP refers to 50kph design speed this should be changed to 60kph. There will be a need to change the corresponding visibility splays from 70m to 90m. There are numerous instances to change. This should include Figures 34, 35 and 36.

172. Paragraph 36 - reference is made to the outcome of a safety audit. It is stated that the design team would respond to any problems identified by accepting the safety audit recommendation or proposing alternatives. This does not close out the issue if the safety auditors do not accept the alternative proposed. SCC requires some text to be added to confirm that works will not commence until the safety audit team has confirmed its acceptance of the design and SCC, as Highway Authority, agree to the outcome.

173. Reference is made to temporary 30mph speed limits. Our advice to the applicant has been that the implementation of a temporary 30mph speed limit will not deliver speeds of 30mph unless there is enforcement or there are other measures. The applicant has not stated what will be proposed if the speeds are not close to 30mph.

174. Figure 21 shows that the swept path over-rides the verge, while there are no swept paths show in Figure 23.

Socio-economic assessment (Document 6.1.28)

Summary

175. The application does not include a thorough analysis of the labour market and skills context of the area in which the development will take place and a number of the conclusions drawn are contradictory to the body of evidence presenting from other sources and the experience of those currently seeking to hire labour within the area. In parallel, the overview of the strength of the existing skills and employment infrastructure and its ability to respond to the needs of this project are, in our view, overstated.

176. As a result, the conclusions drawn in relation to the impact of the development on the labour market of the area, particularly in terms of displacement impact for established businesses, and the potential mitigations already in place, understate the skills and employment challenges and therefore incorrectly assess the sensitivity of the labour market as low. This combined with the approach taken to assess the magnitude of effect creates, in our view, an erroneous assessment of the significance of effect.

177. In respect of tourism, no assessment has been made of the demands an in-migrant workforce may place on the tourist accommodation sector. The focus of the tourism impact has been on the visual effects of a windfarm 69km off the coast, which is not considered especially useful. It is also suggested that the sensitivity of the sector may have been underestimated.

Approach to assessing significance of economic effects

178. The criteria used to determine the magnitude of effect for economic impacts create an issue as they seek to classify an impact as either adverse or beneficial, when in reality it could be both.

179. For example, if 1,000 jobs are created in a labour market of high sensitivity that ostensibly is a positive impact, but in reality it is exaggerating the extent of the problem in the labour market.

180. However, this anomaly is hidden in the determination of significance of impact, because job creation will always be scored positively, which when combined with sensitivity actually leads to ambiguity as to whether the impact is significant in a positive or negative way.

181. The conclusion in the assessment is that because the project creates more than 250 jobs and the labour market is of low sensitivity, the significance of effect is minor-moderate *beneficial* (Table 28.24). Even if one argued that the labour market was high sensitivity, the logic of the above would lead you to a conclusion of an impact of major significance, but not clearly whether that was positive or negative and thus whether mitigation is requried.

Regional Skills Policy and Infrastructure Analysis and Fit

182. The proposal is weak with respect to ensuring fit with Suffolk and the wider New Anglia Local Enterprise Partnership (LEP) skills policy and infrastructure. The two most significant policy and strategy documents for this development are the New Anglia LEP Skills Manifesto and the Suffolk Growth Strategy. While these are both briefly mentioned (p22 and p31), both references are cursory, with poor analysis and no attempt is being made to draw out from

these documents the key elements of activity that would complement the skills and employment needs for this proposed development or could be further enhanced by additional actions taken by the applicant and their contractors.

Socio-Economic Baselines

183. The analysis of the data in Table 28.8 and the conclusions drawn from this in Table 28.9 are, in our view, superficial and inaccurate; the overall assessment that has been made is that "*the area has a readily available labour force. Unlikely to lead to labour* market *pressure or distortion*" and therefore the assessed sensitivity of the proposed development on the labour market is "low". This conclusion is flawed because:

    a) No account has been taken of the fact that this pool of skilled labour is currently employed (hence low unemployment rates) and therefore there is likely to be a significant displacement effect of the project in the labour market which has not been taken into account in the assessment;

    b) Analysis that has been undertaken of the range of competing infrastructure and housing projects that will/could be taking place within the drive to work area concurrently is superficial (see below), and will therefore place a further pressure on demand for labour;

    c) No analysis has been undertaken of the current skills shortages that are reported by employers in the construction, engineering and agricultural sectors - all of which draw on the same pool of skilled manual and skilled workers; and

    d) The analysis of population growth does not assess the projections of the type of inflows and the likely occupations: skilled, semi-skilled, professional.

Education and Training Infrastructure

184. While the submission identifies a number of education and training infrastructure developments, there is no analysis of how robust these are or the impact that they could contribute in mitigating the increase demand for labour during the construction of East Anglia THREE.

185. Finally, the assumption at Paragraph 125 that the scale of the opportunity within the wind energy sector will result in a market response from skills and training providers to increase demand for training is not evidenced in the submission and neither is this hypothesis supported by passed examples for similar developments.

186. Given the very challenged state of both the private and public sector training and skills infrastructure this assumption of a market response is likely to be overly optimistic. The applicant will need to consider how it and its contractors can support the training and skills market to respond through a collaborative approach.

Sensitivity testing

187. In its response to the Preliminary Environmental Information Report (PEIR) as documented in Table 28.1, SCC suggested some sensitivity testing was required to account for changes in labour market conditions between now and the construction of the project. The sensitivity testing undertaken tests deviations in the amount of jobs created (paragraphs 178-179), not in the

sensitivity of the market, which is the issue where there is considerable uncertainty.

Cumulative economic impacts

188. The cumulative assessment, while accurately identifying major construction projects in the vicinity, does makes some far reaching conclusions on the ability of the construction sector to respond to them.

189. Its analysis is based simply on how many construction workers there are in the sector today and how many might be needed to build this selection of projects. As is well documented in CITB reports and elsewhere there are significant skills shortages in the construction sector and it would be inaccurate to suggest that all "construction" workers are suited to working on these projects and this of course represents a very small fraction of "construction" activity in the region likely to be underway which coincides with the project. A simplistic analysis such as this would most likely suggest that there is no skills shortage in the construction sector and as such this assessment suffers similar failings to the standalone assessment as described above.

Recommendation

190. SCC does not accept the assessment that the significance of effect during the construction phase (Table 28.24) is "minor-moderate beneficial" and no mitigation measures are required.

191. It is strongly recommended that the applicant should be asked to put forward additional plans for mitigation that build on the existing Skills Strategy for East Anglia ONE and increase its impact, and in doing so also addresses these points. This action on the part of the applicant would also fulfil its stated intention (paragraph 165) that the Skills Strategy now agreed for East Anglia ONE would be incrementally developed as further rounds came forward. Reliance on the work of others (paragraph 224) to mitigate the effects of this development on the labour market is not considered to be sufficiently robust.

Tourism

192. Paragraph 12 states that the single phase is considered to the worst case as there would be a lower overall economic impact. This approach may create less jobs, but a two phase approach, being longer, is a worse case where negative effects may arise, such as those on the tourism sector.

193. Paragraph 26 states the focus of the impact on tourism has been associated with the visual effects of the wind turbines. Given that the windfarm is 69km off the coast, this is essentially a redundant exercise.

194. The assessment rather ignores the most likely impact on the tourism sector, that being the use of tourist accommodation by construction workers. SCC made similar comments in relation to the East Anglia ONE project and the applicant subsequently produced a document to address this entitled *Assessment of Workforce Effects on Tourism Accommodation Providers in East Anglia* and it is suggested this could be usefully refreshed for this project, taking in to account cumulative impacts arising from the demands on such accommodation from other projects.

195. Paragraph 162 suggests that the tourism study area is of medium sensitivity – which means the sector has "regional status and/or medium visitor numbers" (Table 28.5).

196. According to the Economic Impact of Research reports produced by Destination Research, in 2014 there were 10.8 million trips made to Suffolk Coastal and Waveney districts, with a total visitor spend over £448m, supporting the employment of 12,300 individuals.

197. We would argue that these figures, read alongside the list of tourist attractions of national interest, for example the market towns of Woodbridge, Aldeburgh, Southwold combined with environmental attractions of national renown, such the Suffolk Coast and Heaths AONB and RSPB Minsmere, suggest that the sector is likely to be of high sensitivity.

Distribution of workers

198. Paragraph 6 states that "*Drive time catchments of 30 and 45 minutes from Woodbridge and Bramford (Figure 28.1) have been used to provide a locational assessment of* onshore *construction workers. Locations for in-migrant workers are weighted as a value of 1 within 30 minute drive-time catchment and 0.5 within a 31-45 minute drive-time catchment to reflect distance decay*"

199. This is slightly confused by Table 28.15 which tabulates construction effects with only reference to Woodbridge (footnote 24) and by paragraph 183 which suggests in-migrants will live within 60 minutes of the onshore cable route (footnote 26).

200. As noted previously, see Table 28.1 (p7), it is illogical that an in migrant worker would relocate to accommodation further from the project than a resident worker; in fact the reverse is likely to be true, with resident workers likely to commute further on a daily basis than an in-migrant worker.

201. The consequence of this is that in Table 28.16 and Table 28.18, those resident onshore workers are likely to be distributed over a wider area, perhaps 60 minutes, while those in-migrant workers (Table 28.17/Table 28.19) would be located closer to the project. It is acknowledged that a sensitivity test to look at the consequences of this redistribution has been undertaken as part of the transport assessment (Document 6.1.27).

202. There is an error in paragraph 191 which has seen the middle sentence incorrectly copied from the middle of paragraph 186.

203. In respect of in-migrant workers, there is no analysis of the relative affordability/availability of accommodation in settlements to which they are assigned. Aldeburgh, for example is notoriously expensive and it is implausible that construction workers would take up accommodation there – see comments above under tourism.

204. The aforementioned suggestion of revisiting the *Assessment of Workforce Effects on Tourism Accommodation Providers in East Anglia* done for East Anglia ONE should consider a distribution of in-migrants at a maximum of 45 minutes from Woodbridge or Bramford and consider the affordability of accommodation in that area.

Supply chain

205. It is noted (Paragraph 13) that the East Anglia ONE Supply Chain Plan aims for 50% UK content from that project, laying the foundations for 55% over the next 3GW, which would include East Anglia THREE. Paragraph 113 goes on to say that extensive further investment in "all aspects of infrastructure" will be needed to increase local and regional supply chain capacity, but if that does continue

much of East Anglia THREE's project development and operational requirements could be met by the time of construction and operation (paragraph 115).

206. We would welcome further discussions with the applicant to ensure that the necessary infrastructure is in place to maximise the benefit to the local supply chain.

Design and Access Statement (Document 8.3)

207. Please see comments above in relation to the assumed baseline for the assessment of landscape and visual effects which are repeated in this document (paragraphs 31-34).

208. This document largely repeats information found elsewhere in the application. Its value lies in the Design Principles outlined therein (Table 2) which relate to the substation site. It is suggested these could be extracted, elaborated with more imagery (for example to reflect design solutions, not just baseline characteristics) and replace the DAS as the document referred to in Requirement 12 (3).

209. There is some scope for refinement of the Design Principles, for example to reflect that it is the substation *site and environs* to which the Principles apply, not just the buildings.

210. Along similar lines it would therefore be helpful to include reference to ancillary infrastructure including the access road, fencing and lighting.

211. Finally there will be a need to ensure that the proposals for East Anglia THREE mesh with the outcome of the East Anglia ONE proposals such that the respective substation sites complement each other, rather than contrast or clash in anyway and this could usefully be reflected in the Design Principles.

Health Impact Assessment (Document 8.14)

212. SCC is responsible for public health in Suffolk. SCC is content with the HIA. The assessment makes reference to a minor beneficial effect of jobs, and clearly if job opportunities for local people can be maximised that would be the greatest benefit to the wellbeing of people in Suffolk.

Miscellaneous comments

213. With the exception of Top Street, Woodbridge, CCSs are not "brownfield sites" as the Environmental Statement suggests (paragraph 368).

214. The Consultation Report (Document 5.2 (38)) suggests at various points that the local authorities are "in agreement" with the applicant on a number of matters in an all-encompassing way. We would refer to our comments here and to our forthcoming Statement of Common Ground which will provide confirmation of our position.