

PLANNING ACT 2008 (as amended)
East Anglia THREE Offshore Windfarm

Suffolk County Council
Mid Suffolk District Council
Suffolk Coastal District Council

LOCAL IMPACT REPORT

1. Terms of Reference

Introduction

1.1. This report comprises the joint Local Impact Report (LIR) of Suffolk County Council (SCC), Mid Suffolk District Council (MSDC) and Suffolk Coastal District Council (SCDC).

1.2. A LIR is defined by Section 60(3) of the Planning Act 2008 (as amended) as, ‘a report in writing giving details of the likely impact of the proposed development on the authority’s area (or any part of that area)’.

1.3. In preparing this LIR the local authorities have had regard to the DCLG’s *Guidance for the examination of applications for development consent* (2015) and the Planning Inspectorate’s Advice Note One, *Local Impact Reports* (2012).

Scope

1.4. The implementation of the project is reliant upon the use of cable ducts that will be constructed in association with the East Anglia ONE offshore windfarm. The Development Consent Order for this project was made by the Secretary of State on 16 June 2014. At the conclusion of that examination no areas of uncommon ground remained with the applicant.

1.5. The local authorities are now working with East Anglia ONE on the discharge of the requirements for that project and are developing the ‘control documents’ that the respective requirements provide for, be it the Code of Construction Practice or Traffic Management Plan. Those discussions have not unearthed any significant issues. As such, we anticipate that through that process we will be able to discharge the requirements for East Anglia ONE and we would therefore anticipate that those same control documents will inform the implementation of East Anglia THREE and thus consider that the impacts of this project can be appropriately controlled.

1.6. The LIR relates to onshore impacts of the proposed development as it affects the administrative areas of SCC, MSDC and SCDC. Specifically, it describes the impact of Works 5B to 69 (as described in the Development Consent Order (DCO)), namely;

- up to four circuits pulled through existing ducts laid underground from Bawdsey Cliffs to a site adjacent to the National Grid substation at Bramford,
- an onshore substation and associated landscaping at Bramford,
- temporary access tracks and construction consolidation sites, and

- other associated development described in Work 69.

Purpose and structure of the LIR

1.7. The LIR's primary purpose is to identify the policies in Local Plans in so far as they are relevant to the proposed development and the extent to which the development accords with these policies. It does this under topic-based headings (following the form of the Overarching National Policy Statement (NPS) for Energy (EN-1)) reflecting the likely nature of impacts. The key issues for the local authorities and the local community are then identified, followed by commentary on the extent to which the applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant. The DCO referred to throughout is Version 2, dated July 2016.

1.8. While a number of the points made in the LIR are repeated from the local authorities' respective Section 56 consultation responses, the importance afforded to the LIR in the Planning Act is such that they are confirmed here so that the Examining Authority and the Secretary of State are in no doubt of the local authorities' views. The LIR has sought not to unnecessarily duplicate other material submitted to this deadline, namely that covered in the Statement of Common Ground (SoCG) and our response to the Examining Authority's first written questions, so these documents should be read together.

2. Description of the area

2.1. The circuits will be pulled through approximately 37km of pre-existing cable ducts from Bawdsey in Suffolk Coastal District to Bramford in Mid Suffolk District.

2.2. The route commences within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) at Bawdsey, one of the fastest eroding stretches of the Suffolk Coastline, which itself is one of the fastest eroding coastlines in the country. The ducts then pass under the unconsolidated cliffs which are also a designated SSSI for their geological interest.

2.3. The ducts pass under the Deben Estuary Special Protection Area and Ramsar Site in crossing the Deben itself and at Martlesham Creek.

2.4. Approximately one third of this route is through the Suffolk Coast and Heaths AONB. A further fifth is through Special Landscape Areas between Kirton and Newbourne, and Martlesham to Tuddenham in Suffolk Coastal District and the Gipping Valley Special Landscape Area in Mid Suffolk.

2.5. The ducts pass through a range of landscapes that broadly comprise the following; from the landfall at Bawdsey the ducts cross the flat landscape of coastal levels, on both sides of the Deben, made up of largely grassland and arable fields bounded by dykes. The route then strikes north along the western slopes of the Deben valley. This landscape is characterised by large arable fields of light soil, bounded by sparse hedges and scattered with plantation woodland.

2.6. North of Martlesham Creek the route turns west along the Fynn Valley and up onto the higher land north of Westerfield. This area is a rolling arable landscape, dissected by several small streams, with Ancient Woodland, small parklands plantations and grassland.

Although some hedges have been lost from this area, much of the network of ancient and species rich hedgerows remain.

2.7. As the ducts cross into Mid Suffolk the landscape changes. The countryside is more open with very large arable fields and extensive post war hedgerow loss. However, as the route goes down into the Gipping Valley, the landscape changes again with plantations and belts of designed estate landscapes appearing. After crossing the Gipping Valley the route climbs onto the boulder clay plateau, which in this area is scattered with Ancient Woodland and large, but well hedged, arable fields.

2.8. The ducts pass to the south and west of Sutton Hoo, an Anglo-Saxon site of national importance, though through a number of other areas of high archaeological significance, notably the northern side of the Felixstowe peninsula and the valley of the River Gipping. It also traverses the hinterland of Ipswich, one of the earliest and most important towns in the country in terms of archaeological significance.

2.9. The connection terminates on land adjacent to National Grid's substation at Bramford, where the existing overhead power infrastructure is a visually dominant detractor in this landscape as transmission lines and towers converge on the substation. However, the blocks of woodland partially mitigate the impacts of the existing sub-station structures.

2.10. The ducts therefore traverse a largely rural area, characterised by scattered settlements and a generally low population density. Access to this rural hinterland is largely restricted to lower order roads, a number of which do not regularly accommodate large numbers of Heavy Goods Vehicles.

2.11. The land affected is mostly in agricultural use, a key sector for the local economy. Also of importance is tourism, largely associated with the natural and historic beauty of the area, and an emerging energy sector. The area is however characterised by household earnings lower than the regional average and a lower proportion of workers with high level qualifications than the national average.

2.12 In summary, the development affects a largely rural area characterised by a natural, heritage and historic environment of international recognition. The local economy is dominated by small and medium enterprise business, with a large proportion of employment derived from agriculture and tourism. The economy is however evolving to respond to opportunities, particularly in the energy sector.

3. Statutory Development Plan

3.1. The Planning and Compulsory Purchase Act 2004 Section 38 (3)(b) (as amended) describes the development plan as the development plan documents which have been adopted or approved in relation to that area.

3.2. The relevant documents that comprise the development plan are identified below. Other policy documents which might be considered as material considerations are also identified.

Mid Suffolk District Council Local Plan

3.3. The Local Plan comprises the **Mid Suffolk Core Strategy Development Plan Document** (2008); **Mid Suffolk Core Strategy Focussed Review** (2013); **Stowmarket Area Action Plan** (2013) and the saved policies of **the Mid Suffolk Local Plan** 1998¹.

3.4. Paragraphs 214-215 of the National Planning Policy Framework (“the Framework”) state that once 12 months has elapsed from its publication (on 27th March 2012), due weight should be afforded to existing policies in local plans according to their consistency with the Framework. Paragraph 3 confirms that the Framework can be a material consideration in the consenting of Nationally Significant Infrastructure Projects.

3.5. MSDC has also adopted as non-statutory Supplementary Planning Guidance the **Section 106 Developers Guide to Infrastructure Contributions in Suffolk** (2013)² (“the Developers Guide”), which sets out the Suffolk local authorities’ approach to securing planning obligations from new development.

3.6. Of the adopted development plan documents, the Stowmarket Area Action Plan is not relevant to the proposed development. With the exception of the Developers Guide, the adopted Supplementary Planning Guidance is also not relevant to the proposed development.

Suffolk Coastal District Council Local Plan

3.7. The current development plan comprises the saved policies of the **Suffolk Coastal Local Plan** (1994) incorporating first (2001) and second (2006) alterations³ and the **Suffolk Coastal District Local Plan** (formerly the Local Development Framework) 2013.

3.8. SCDC approved its **Core Strategy and Development Management Policies Development Plan Document** on 5 July 2013⁴ and hence these policies now have significant weight. The saved policies of the previous Local Plan are largely site specific and not relevant to this development proposal. As an adopted Local Plan, the development management policies have been drafted in line with national guidance, and thus do not go in to the level of detail of those within Mid Suffolk’s Local Plan and are designed to be read alongside the Framework.

3.9. There is no Supplementary Planning Guidance relevant to this project.

Suffolk County Council Minerals and Waste Development Framework

3.10. The Minerals and Waste Development Framework comprises the **Minerals Core Strategy Development Plan Document** (adopted 2008); the **Minerals Site Specific Site Allocations Development Plan Document** (adopted 2009) and the **Waste Core Strategy Development Plan Document** (adopted 2011)⁵. It does not however include any specific policies that would be relevant to this development.

Other relevant local policy

3.11. As decreed by the Highways Act 1980, SCC is the highway authority for Suffolk. Under the provisions of the Transport Act 2000, and the Countryside and Rights of Way

¹ <http://www.midsuffolk.gov.uk/planning-and-building/planning-policy/>

² <http://www.midsuffolk.gov.uk/planning-and-building/planning/developers-guide-to-infrastructure-contributions/>

³ <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/policy/localplan/>

⁴ <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/corestrategy/>

⁵ <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/minerals-and-waste-development-framework/>

Act 2000, adopted its **Local Transport Plan 2011-2031**⁶ and **Rights of Way Improvement Plan 2006-2016**⁷. These constitute statements of SCC policy on these matters.

3.12. SCC has also adopted the aforementioned **Section 106 Developers Guide to Infrastructure Contributions in Suffolk (2013)** as council policy.

3.13. SCC has produced, in association with the Suffolk local planning authorities, and adopted **Air Quality Management and New Development (2011)**⁸ as council policy. The District Councils also use this document as informal planning guidance.

3.14. SCC is a Lead Local Flood Authority as defined in the Flood and Water Management Act 2010 and is therefore responsible for dealing with flooding from surface water, groundwater and ordinary watercourses⁹ and for co-ordinating a partnership approach to flood management in Suffolk. The Act requires SCC to develop, maintain, apply and monitor a strategy for local flood risk management in its area. The statutory **Suffolk Flood Risk Management Strategy**¹⁰ was published in March 2016. This strategy has been adopted by the district councils.

3.15. **The Suffolk Shoreline Management Plan (SMP)** 7¹¹ was published in 2012. The preparation of an SMP is the duty of the operating authorities responsible for managing the coastline. SCDC adopted the SMP in November 2011, which has also been endorsed by SCC.

3.16. **The Suffolk Growth Strategy (2013)**¹² has been endorsed by all Suffolk's local authorities. It sets out a joint ambition for green economic growth and to create more, higher value, better-paying jobs, and more wealth. It identifies nine economic sectors that will drive the growth of the Suffolk economy including energy, ports and logistics, food, drink and agriculture and tourism. It recognises the potential opportunities that will arise in the offshore industry, making specific reference to the East Anglia Array, though does identify skills and qualifications as a barrier to growth.

3.17. New Anglia Local Enterprise Partnership (NALEP) which covers Norfolk and Suffolk has identified energy, tourism and the green economy among its priorities and is currently consulting on the **New Anglia Plan for Growth**¹³. It identifies the Great Yarmouth and Lowestoft Enterprise Zone¹⁴ (which also has CORE status¹⁵) as being the heart of the East of England Energy Coast and key to the future prosperity of the LEP area. It, like the Suffolk Growth Strategy, identifies addressing skills needs and shortages as a key priority.

3.18. In addition, it should be noted that devolution arrangements for East Anglia have been under discussion with Government. The intention is to create two combined authorities, one for Norfolk and Suffolk and another for Cambridgeshire and Peterborough.

⁶ <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/transport-planning/local-transport-plan/>

⁷ <http://publicrightsofway.onesuffolk.net/home/rights-of-way-improvement-plan/>

⁸ <http://www.suffolk.gov.uk/business/planning-and-design-advice/supplementary-guidance-air-quality-management-and-new-development-2011/>

⁹ i.e. not main rivers, for which the Environment Agency has responsibility

¹⁰ <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/19431A-Flood-Risk-Management-Strategy-v12.pdf>

¹¹ <http://www.suffolksmp2.org.uk/index.php>

¹² <http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Business/Business%20Services/Economic%20development/2013-05-08%20updated%20growth%20strategy.pdf>

¹³ <http://www.newanglia.co.uk/About-Us/Plan-for-Growth>

¹⁴ <http://www.newanglia.co.uk/Activities/Enterprise-Zone>

¹⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/31738/11-1395-energy-for-new-anglia-core.pdf

3.19. ***The Suffolk Coast and Heaths Area of Outstanding Natural Beauty Management Plan***¹⁶, has been produced in accordance with the Countryside and Rights of Way Act 2000. It seeks to conserve and enhance the special landscape (and seascape) characteristics of the AONB and ensure that they are taken in to account and enhanced by the planning process, with impacts of major infrastructure development avoided, mitigated or offset. It promotes, and recognises the importance of, sustainable recreation and tourism within the AONB and seeks to enhance the understanding of its historic and cultural assets. The Suffolk Heritage Coast is largely contained within the AONB and there are no statutory requirements or powers associated with the Heritage Coast definition.

3.20. ***The Sizewell C Suffolk Coast and Heaths Area of Outstanding Natural Beauty Natural Beauty and Special Qualities Indicators***¹⁷ was published on 20 November 2015. It seeks to establish what constitutes the natural beauty and special qualities of the whole of the AONB (it is not Sizewell C specific). The document follows a rigorous criteria based approach for establishing and identifying the special qualities of this nationally important landscape.

Summary

3.21. In summary, the statutory development plan for the area comprises the Suffolk Coastal District Local Plan, Mid Suffolk District Local Plan and Suffolk County Council's Minerals and Waste Development Framework. Given the age of policies in the Mid Suffolk Local Plan, decision-makers are required to have due regard to its consistency with the Framework.

3.22. There are a number of additional documents produced and endorsed by the relevant authorities which represent local policy on particular topics and which the local authorities consider of relevance to this development.

ASSESSMENT OF IMPACTS AND ADEQUACY OF RESPONSE

4. INTRODUCTION

4.1. The following sections identify the relevant policies within the development plan and other local policy, the key issues raised by the proposed development and the extent to which the applicant addresses them and thus the proposal complies with local policy.

4.2. As mentioned, for ease of reference, the headings broadly reflect those used in Part 5 of the Overarching NPS for Energy (EN-1).

5. THE PRINCIPLE OF THE DEVELOPMENT

Mid Suffolk policies¹⁸

¹⁶ <http://www.suffolkcoastandheaths.org/about-us/aonb-management-plan/>

¹⁷ <http://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/AONB-special-qualities-document.pdf>

¹⁸ Policies commencing 'CS' denote reference to the Mid Suffolk Core Strategy DPD (2012). Policies beginning with any other letters denote reference to the Local Plan (1998)

5.1. E10 recognises that industrial development is only acceptable in the countryside in exceptional cases and sets out various matters to be considered. CS2 lists employment-generating development and renewable energy projects among those as being potentially acceptable in the countryside.

Suffolk Coastal policies¹⁹

5.2. SP12 supports development that contributes towards the mitigation of climate change and encourages, *inter alia*, renewable energy schemes “where consistent with the need to safeguard residential amenity, the environment and the landscape”.

Other local policy

5.3. The Suffolk Growth Strategy and emerging New Anglia Plan for Growth in particular provide support for offshore wind development based on the likely local economic benefits.

Commentary

5.4. The development plans do not contain detailed policies which specifically relate to the principle of the proposed project however they allow for such development in certain circumstances if particular criteria are met.

5.5. While the assessment of the project against more specific local plan policies is discussed in further detail below, the local authorities consider that in principle the development is in accordance with the development plan and are for that reason supportive of it. Broader support for the development can also be found in the relevant growth strategies for this area.

Adequacy of the application/DCO

5.6. The DCO adequately describes the development which it proposes to authorise.

6. AIR QUALITY AND EMISSIONS

Mid Suffolk policies

6.1. H16 concerns the protection of existing amenity generally, while CS4 refers to avoiding negative impacts on air quality specifically.

Suffolk Coastal policies

6.2. DM23 refers to the need to avoid adverse impacts on residential amenity arising from reduced air quality and light pollution.

Other relevant local policy

6.3. Box 1 in the *Air Quality Management and New Development* guidance sets out the circumstances in which an Air Quality Assessment may be required; this includes applications where significant numbers of HGVs movements may be generated over an extended period of time.

¹⁹ All policy references refer to the Suffolk Coastal Core Strategy and Development Management Policies DPD (2013)

Key local issues

6.4. The main impacts are likely to arise during the construction phase of the project and are likely to be associated with the emissions from construction vehicles, particularly HGVs.

Adequacy of application/DCO

6.5. It is not anticipated that there will be any significant localised impacts on air quality associated with HGV movements and the relevant local guidance will be complied with. Requirement 22 of the DCO provides for the production of a Code of Construction Practice (CoCP). Consequently, the local authorities are satisfied that any impacts on air quality can be adequately controlled. The project therefore complies with local policy.

7. BIODIVERSITY AND GEOLOGICAL CONSERVATION

Mid Suffolk policies

7.1. CS5 requires all development to maintain and enhance the environment, and specifically to protect and enhance biodiversity through recognition of designated sites, biodiversity action plan species and habitats and wildlife corridors and ecological networks. CL5 outlines that development which would result in loss or damage of woodland, in particular commercial or ancient woodland shall be refused, while CL8 similarly advocates refusal for development that is likely to result in loss of or significant alteration to, important habitats or result in threats to rare or vulnerable species. CL9 sets out protection for nationally and locally designated sites.

Suffolk Coastal policies

7.2. DM27 requires protection and enhancement of habitats and their biodiversity value. Adverse impacts on protected/priority species will not be permitted unless adequate mitigation and/or compensation is provided. There is particular emphasis on minimising habitat fragmentation and maximising opportunities for habitat connectivity.

Other relevant local policy

7.3. The Suffolk Coast and Heaths AONB Management Plan sets out the intention to conserve and enhance the landscape including biodiversity, noting the particular importance of habitat connectivity in responding to climate change.

Key local issues

7.4. Minimising the ecological impacts of the project is a significant concern locally and securing adequate mitigation for this purpose has been the subject of scrutiny by the local authorities.

7.5. While much of the mitigation measures will be secured and agreed through East Anglia ONE, in particular the Landscape and Ecological Management Plan, East Anglia THREE raises some new issues in respect of its relationship with that earlier project, and also in relation to skylarks, a priority species.

Adequacy of application/DCO

7.6. While East Anglia THREE is no longer proposed to be a multi-phase project those mitigation measures outlined in the Temporary Works Reinstatement Plan (document 8.16) would need to be applied to the period between East Anglia ONE and East Anglia THREE, should temporary works be retained between the projects. The local authorities have the power to require this under Requirement 30 of the EA ONE order.

7.7. In relation to skylarks, as set out in SCC's S56 response, the substation development would reduce the habitat available to this priority species, or in the terms of EN-1, 'species of principal importance for the conservation of biodiversity'. As such there is, in accordance with EN-1 paragraph 5.3.17, a need to ensure that such species are protected from the adverse effects of development using requirements or planning obligations. This remains a matter under discussion with the applicant.

7.8. Skylarks aside, the local authorities are content that the ecological impacts of the development can be controlled to an acceptable level through the existing provisions in the DCO, namely compliance with Requirements 21, 22 and 23.

8. COASTAL CHANGE

Mid Suffolk policies

8.1. N/A

Suffolk Coastal policies

8.2. SP30 relates to the Coastal Zone and seeks an integrated approach to considering development on the coast having regard to the adopted Strategic Flood Risk Assessment, the Shoreline Management Plan and any Estuarine Plans endorsed by the District Council.

Other relevant local policy

8.3. Policy Development Zone 6 of the Shoreline Management Plan 7, Orford Ness to Cobbold's Point, identifies a policy of No Active Intervention for the Bawdsey Cliffs at the point of landfall.

Key local issues

8.4. The main area of concern for the relevant local authorities is the potential for the project to interfere with coastal processes in the locality of the landfall point and the consequential implications for cliff stability should erosion rates be affected. Specifically there was concern that the export ducts and cables would need protecting in the future - with associated implications for scour.

Adequacy of application/DCO

8.5. DCO requirement 13 requires a landfall method statement to be submitted which must include measures to minimise the impact of the works on cliff stability and coastal erosion during construction.

8.6. In respect of decommissioning, the applicant has set out that

Article 5(6) of the East Anglia ONE Order makes clear that on a transfer or lease under Article 5(1) or 5(2) the exercise of any benefits or rights shall be subject to the same restrictions, liabilities and obligations as would apply under the East Anglia ONE Order if those benefits or rights were exercised by the undertaker. Accordingly, in the event that the ducts proposed to be used by East Anglia THREE are transferred [from EA ONE to EA THREE], so will the obligation (to assess the ducts in the manner and at the time specified in Requirement 32 of the East Anglia ONE Order) be so transferred²⁰.

8.7. As such these processes should ensure that the export ducts and cables are adequately protected from any erosion.

8.6 The proposals adequately respond to the local policy context.

9. FLOOD RISK

Mid Suffolk policies

9.1. CS4 offers support to development that avoids areas of future and present flood risk, promoting location of development in Flood Zone 1. Proposals situated in Flood Zones 2 or 3 must undergo the relevant flood risk tests. The supporting text notes the importance of SuDS to minimising flood risk.

Suffolk Coastal policies

9.2. Development is not permitted in Flood Zones 2 and 3 by policy DM28 unless the relevant tests in the Technical Guidance to the Framework have been complied with. This includes the sequential test, exception test (as necessary) and site specific flood risk assessment.

Other relevant local policy

9.3. The Suffolk Flood Risk Management Strategy sets out guiding principles on tackling flooding and integrates the issue of flooding from surface water runoff and from ordinary watercourses. One of the key objectives is to prevent an increase in flooding as a result of new development by ensuring Sustainable Drainage Systems (SuDS) are properly considered and incorporated into works. The document notes the importance of aligning with the content of Shoreline Management Plans and River Basin Management Plans to ensure a holistic approach is taken to flood and coastal management and water quality.

Key local issues

9.4 The local authorities have not identified flood risk as a significant concern, though have noted that a robust Sustainable Drainage strategy will be required for the substation site to ensure that the existing green field run-off rate is maintained and the impacts in the locality from pluvial (surface water) flooding are controlled.

Adequacy of application/DCO

²⁰ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010056/EN010056-001040-Schedule%20of%20Issues%20\(Applicant_s%20Response\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010056/EN010056-001040-Schedule%20of%20Issues%20(Applicant_s%20Response).pdf) P38

9.5 Requirements 18 and 22 provide for surface water drainage plans to be submitted to the local planning authority in accordance with the Outline Code of Construction Practice submitted with the application. These mechanisms should adequately control flood risk. The development complies with local policy in this respect.

10. HISTORIC ENVIRONMENT

Mid Suffolk policies

10.1. HB1 gives protection to the character and setting of listed buildings. HB14 concerns development that could adversely affect an archaeological site or its setting. The policy allows for development where satisfactory measures to preserve or excavate and record the archaeological remains are secured. HB15 sets out support for applications which seek to promote archaeological finds as an educational resource.

Suffolk Coastal policies

10.2. DM21 requires that the design of any development should have regard to the need to protect existing features that have a heritage value and that where possible such features should be enhanced.

Key local issues

10.3. The main issues relate to the possible loss and potential damage to archaeological remains within the corridor accommodating the cable ducts and at the substation site, and the impact of the substation on the setting of designated heritage assets (listed buildings).

10.4. In the case of the latter, the majority of the listed buildings concerned are farmhouses or former farmhouses. The local authorities can confirm that, having reviewed the location of these buildings within the vicinity of the project and evaluated the contribution that their setting makes to the significance of the asset, have concluded that the impact of the substation on these buildings would not be harmful within the meaning provided by the national framework in all cases. The development does not therefore conflict with HB1 of the Mid Suffolk Local Plan.

10.5. The majority of the development site will have been archaeologically evaluated as part of the East Anglia ONE proposals, however some additional land will be disturbed and archaeological monitoring will be required. 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.

10.6. Groundworks associated with the proposed converter station, including preparation of the site, will need to be 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. This will need to be reflected when the Written Scheme of Investigation is reviewed in accordance with Requirement 20.

Adequacy of application/DCO

10.7. The impact of any remaining onshore archaeological heritage assets that have not already been evaluated via the implementation of the East Anglia ONE project is controlled by DCO Requirement 20 and the Outline Written Statement of Investigation (WSI). The local authorities are therefore satisfied that this provides for sufficient safeguards, though the WSI will need to be updated in the terms outlined above.

11. LANDSCAPE AND VISUAL

Mid Suffolk policies

11.1. CL2 outlines that Special Landscape Areas must be safeguarded and that development occurring in these areas must be appropriately designed in relation to materials, layout and landscaping. CL3 requires utilities and power lines exceeding 33KV to be located in areas that minimize intrusion on the landscape. The policy also notes that the feasibility of undergrounding will be a material consideration. CL5 provides protection for existing woodland. E12 requires the protection of existing landscape features and submission of landscaping schemes for new industrial development in the countryside. Policy E8 notes that extensions to existing industrial premises in the countryside should not adversely affect the landscape. CS5 notes the intention to protect and conserve the landscape as a whole and ensure new development is informed by landscape character. CS6 confirms that new development will be expected to provide or support the delivery of green infrastructure including that which provides environmental improvements.

Suffolk Coastal policies

11.2. SP15 contains a commitment to protect and enhance the various landscape character areas within the District. These include not only the statutory designations such as the Suffolk Coast and Heaths AONB but also refer to the Special Landscape Areas covered by Policy AP13 of the saved policies from the earlier Local Plan relating to a number of river valleys and tributaries including the Deben and Fynn valleys which are affected by the cable route.

Other relevant local policy

11.3. The Suffolk Coast and Heaths AONB Management Plan draws attention to the special landscape characteristics of the AONB and that they should be protected and enhanced. The Sizewell C Suffolk Coast and Heaths AONB *Natural Beauty and Special Qualities Indicators*, highlights the special qualities of the area and forms an important part of the baseline to help inform the design of development and against which to judge the effects of proposed development within the AONB.

Key local issues

11.4. The principal issues of concern relate to the residual impacts associated with the impact on hedgerows in the cable corridor and the associated constraints on replanting (and consequential impacts for landscape character), the appearance and scale of kiosks used where cables are being jointed (if required), and the appearance and scale of the converter station at Bramford.

11.5. In terms of the permanent development, the overriding area of concern centres upon the substation at Bramford; in particular whether all reasonable endeavours have been made to minimise its impact, both through the size parameters of the building itself and its siting, and through the provision of both on and off-site planting. These matters have been a key concern of Burstall Parish Council (in Babergh District) and local residents in the area. The substation would not be readily visible from the majority of residences in Bramford due to local topography.

11.6. These are similar issues to those encountered during the consenting of East Anglia ONE, and for which adequate mitigation measures have been agreed for that project.

11.7. However, since that time the presence of Chalara in the region has given cause for new concern over the long term viability of existing woodland at Bramford, which provides an important screening function. Additionally, there is of course the landscape and visual effects that might be associated with the retention of any infrastructure between projects.

Adequacy of application

11.8. The use of pre-existing cable ducts local along the entire route will provide significant mitigation against visual and landscape impacts, thus meeting the particular test of policy CL3 of the Mid Suffolk Local Plan. Provisions exist within the East Anglia THREE DCO to secure the restoration and replanting of hedgerows removed as part of construction works. It is not therefore expected that there will be any significant residual impacts on the character of the landscape in the connection corridor arising from the use of the ducts.

11.9. Additionally, while no details have been submitted to show the possible location, design and appearance of the jointing bays/kiosks (if required) the local authorities are satisfied that the provisions of DCO Requirement 12 are sufficient to minimise local impacts.

11.10. With respect to the design of the substation the Design and Access Statement sets out a series of principles that will be applied to ensure that landscape and visual impacts are further reduced. This is discussed further in Section 18 below.

11.11. Finally, a Section 106/Section 111 agreement was completed between Babergh and Mid Suffolk District Councils and East Anglia ONE Ltd to address any residual visual impacts through new hedgerow and tree planting within a 3km radius of the substation site.

11.12. This planting will also help reinforce the character of the landscape and be used to address visual impacts from key views for East Anglia THREE, as identified through the Environmental Statement and, in future, through feedback from the local community. This is a positive provision that will lead to some localised environmental enhancements which would also benefit the existing, and extensive, development at Bramford substation.

11.13. In respect of Chalara, the local authorities have agreed an approach with the applicant, as set out in the Statement of Common Ground that additional planting to the west of Gorbets Grove will be planted to mitigate for the potential loss of screening from ash trees which are prevalent in this woodland.

11.14. As is the case with ecology, measures are required to control the landscape and visual effects of the retention of temporary infrastructure between East Anglia ONE and East Anglia THREE and those set out in the Temporary Works Reinstatement Plan (Document 8.16) provide a sound basis. These measures can be secured through the discharge of East Anglia ONE requirements.

11.15. The one outstanding issue thus remains the revision to the Landscape and Visual Assessment to reflect an adjusted baseline condition which reflects the current proposals for the East Anglia ONE substation. The local authorities will comment on this in due course.

11.16. Subject to a satisfactory revised LVIA, it is currently envisaged that DCO Requirements 14 and 15, in combination with the Design Principles set out in the Design and Access Statement and the pre-existing Section 106/Section 111 agreement will be sufficient to control the landscape and visual impacts to a level which would provide compliance with the relevant local policies.

12. LANDUSE INCLUDING OPEN SPACE AND GREEN INFRASTRUCTURE

Mid Suffolk policies

12.1. CL11 encourages the conservation of agricultural land, with particular importance placed on Grades 1, 2 and 3a. CL12 states regard will be had to the impacts of development on agricultural land on the severance and fragmentation of existing farms. E10 states that applications for commercial and new industrial development in the countryside will be refused unless an overriding need to be located away from towns and villages can be presented. It notes the materiality of a loss of high quality agricultural land. RT12 requires the local planning authority to safeguard footpath and bridleway networks.

Suffolk Coastal policies

12.2. SP12 encourages renewable energy schemes. SP1 & SP1A set out the principles of sustainable development that the Council will seek to have incorporated into new development and contains a presumption in favour of sustainable development which accords with the policies of the Local Plan or, if the Local Plan is silent, with the Framework.

Other relevant local policy

12.3. Both the Suffolk Growth Strategy and New Anglia Plan for Growth identify the importance of the agricultural sector to the economy of the region.

12.4. SCC's Rights of Way Improvement Plan details how SCC will protect and enhance the Public Rights of Way network to improve access to the countryside. It notes the importance of continuity in routes and safety for users.

Key local issues

12.5. The main issues relate to the loss of agricultural land and disruption to agricultural activities and interference with public rights of way. Whether the development is an appropriate use of land has been covered under Section 5, Principle of the Development.

12.6. The majority of the cable corridor route passes through Grade 3 and 4 agricultural land. There is however some Grade 2 land present, including land within the vicinity of the substation site.

12.7. Much of this agricultural land will be reinstated following the implementation of the East Anglia ONE project and is unlikely to be disturbed again by the cabling operations associated with the proposed development. Any disturbance which does occur would be localised and possibly associated with the need to form a cable jointing pit.

12.8. The impacts upon the footpath network are also likely to be localised and short-term in nature. The local authorities are nonetheless keen to see disruption to the network as a whole minimised.

Adequacy of application/DCO

12.9. The local authorities consider that the choice of location for the substation is appropriate as it is outside any designated sites and the surrounding woodland provides a degree of screening, justifying the use of Grade 2 agricultural land. It is also sited within a reasonably self-contained parcel of agricultural land, thus should not cause a particular issue of farm fragmentation.

12.10. Overall the local authorities do not have any concerns over the impacts on agricultural land. The local authorities are accordingly content with the extent of proposed works and confirm that Requirement 30, which provides for the restoration of land temporarily used for construction, should ensure that the land is reinstated to its previous use.

12.11. The CoCP to be submitted pursuant to Requirement 20 will address the management of impacts on the Public Rights of Way network during cabling operations. This will, in the view of the local authorities, minimise any impacts to an acceptable level, given the commitment to limit the extent of closures and provide and advertise diversions.

12.12. Overall the development complies with the relevant local plan policies. Impacts on other land use activities are considered under Section 14, socio-economics, below.

13. NOISE AND VIBRATION

Mid Suffolk policies

13.1. H16 establishes the importance of protecting the existing amenity and character of residential areas, based on this a change to non-residential use will be refused where such change could cause nuisance.

Suffolk Coastal policies

13.2. DM23 sets out that the Council will have regard to the potential adverse impacts of noise and disturbance on residential amenity.

Key local issues

13.3. The noise and vibration impacts arising from cabling operations, the operation of the construction consolidation sites and the associated with HGV movements more generally have been an area of concern to local communities.

13.4. While the substation will generate noise during its operation, the local authorities have not identified this as an area of concern that cannot be controlled through the provisions in the DCO.

Adequacy of application

13.5. DCO Requirements 24, 25 and 26 provide for the control of noise during construction and the subsequent operation of the development. Consequently, the local authorities are satisfied that any impacts can be adequately controlled. The project therefore complies with local policy.

14. SOCIO-ECONOMIC

Mid Suffolk policies

14.1. Policy E10 states that the employment opportunities created by industrial development in the countryside will be material to its acceptability.

Suffolk Coastal policies

14.2. SP1 and SP6 seek to promote economic activity in the district particularly in rural areas and at the Port of Felixstowe.

Other relevant local policy

14.3. The Suffolk Coast and Heaths AONB Management Plan identifies the importance of tourism and recreation to the AONB and the economic benefits derived by the local economy. The Suffolk Growth Strategy and New Anglia Plan for Growth also identify tourism as a key sector for future growth. The latter documents support the development of the renewable sector, but identify that skills levels and shortages are a barrier to growth.

Key local issues

14.4. The development has the potential to deliver significant positive benefits, which the local authorities very much welcome, but further work is required to provide the assurances that the impact of the project on local labour market have been properly assessed and mitigated for.

Adequacy of application/DCO

14.5. As set out in the appendix to the Statement of Common Ground, SCC has outlined its concerns that the applicant has not fully recognised the stresses within the construction skills sector and the cumulative effect of multiple infrastructure projects in the region and how that may be exacerbated by East Anglia THREE.

14.6. As such we would expect that the Skills Strategy agreed through the discharge of requirements for EA ONE to be refreshed in collaboration with local partners and

expanded to include further initiatives to mitigate the impacts of the project, and also to maximise benefits to the local area.

14.7. Discussions remain ongoing with the applicant on this matter.

15. TRANSPORT AND TRAFFIC

Mid Suffolk policies

15.1. Policy T10 sets out the highway matters to be considered in assessing applications. These include the provision of safe access on the site, suitability of existing roads in providing free flow of traffic and pedestrian and cyclist safety, the ability of the surrounding road network to absorb traffic generated from the development, the provision for adequate parking and turning of vehicles and the needs of pedestrians and cyclists accessing the development. Policy E10 notes that the acceptability of traffic impacts will be a key consideration in determining whether industrial development will be permitted in the countryside. T2 states attention will be given to securing highway improvements that bring benefit to traffic and pedestrian safety.

Suffolk Coastal policies

15.2. Policies DM19 and DM20 relate to parking standards and travel plans and promote the use of sustainable, low carbon forms of transport. DM22 sets out the requirement for safe access to development. SP1 sets out an intention to reduce the overall need to travel but where travel is necessary, to better manage the transport network to enable it to function efficiently.

Other relevant local policy

15.3. The Local Transport Plan identifies maintaining the transport networks, tackling congestion, improving access to jobs and markets and encouraging a shift to more sustainable travel patterns as its key objectives.

Key local issues

15.4. The number, size, timing and routing of HGV (and abnormal load) vehicles is a major issue, and is certainly the most widespread, concern of local communities. The particular issues relate to the suitability of such vehicles on rural roads, the damage they may cause to the highway and verge, the conflicts with other users at certain times of the day, including pedestrians where there are no footways, and the general disturbance they generate.

15.5. A further matter raised by the local authorities relates to the adequacy of the transport assessment and the travel plan.

Adequacy of application/DCO

15.6. In its relevant representation, SCC raised a number of points which the applicant has subsequently responded to, namely avoiding the use of Lower Road, Westerfield and undertaking a sensitivity test to ensure that the transport assessment was robust. Our remaining concerns as detailed in the appendix to the Statement of Common Ground relate to the design of access points to the construction works. However, we are content

that through the finalisation of the Access Management Plan and Traffic Management Plan these issues can be adequately resolved.

15.7. In summary, the transport and traffic implications of the development can be adequately controlled through the implementation of measures set out in the Outline TMP, AMS and Travel Plan, which are provided for by appropriate requirements within the DCO. The controls and restrictions in there have been designed to minimise the impacts of HGV movements in particular on the local highway network and respond to local issues – and will have been tried and tested through the construction of East Anglia ONE. The local authorities will work with the applicant to examine the monitoring and enforcement mechanisms that will be needed to ensure the documents are adhered to (and thus included in the final version of the TMP), but provided that they are, the development would comply with local planning policy.

16. WASTE MANAGEMENT

Mid Suffolk policies

16.1. No relevant policy (refer to the Framework)

Suffolk Coastal policies

16.2. SP12 seeks to reduce waste and promote recycling of materials.

Key local issues

16.3. Waste management has not been identified as a key issue for the local authorities as significant effects are not envisaged.

Adequacy of application/DCO

16.4. The Outline Code of Construction Practice contains waste management proposals which would be developed further via Requirement 22 in the draft DCO. Measures would therefore be in place to achieve compliance with local policy.

17. WATER QUALITY AND RESOURCES

Mid Suffolk policies

17.1. Policy SC4 relates to the protection of groundwater supplies, while CS4 sets out development should have no adverse effect on water quality. E10 notes the prospect of pollution from new development in the countryside will be a material consideration.

Suffolk Coastal policies

17.2. SP12 seeks to reduce the use of natural resources and to minimise the risk of pollution.

Key local issues

17.3. Impact on water quality has not been identified by the local authorities as a likely significant effect of the development, although it is noted that additional consents are

relevant to this issue, and may necessitate further environmental assessment – for example SCC is responsible for issuing Land Drainage consents under the Land Drainage Act 1991 for works affecting ordinary water courses where there is no Internal Drainage Board. In issuing consents, SCC will need to ensure that any works permitted are Water Framework Directive (WFD) compliant. However, this is likely to be far less of an issue for East Anglia ONE as the ducts would already be in position and it is likely works to such watercourses would be required.

Adequacy of application/DCO

17.4. DCO Requirement 22 provides for a CoCP to be agreed with the local planning authority. This is likely to require consultation with the Environment Agency in view of its specialist expertise in this topic area. Through the implementation of the CoCP the local authorities are satisfied that local policy compliance can be achieved.

18. DESIGN

Mid Suffolk policies

18.1. GP1 sets out that poor design and layout will normally be refused in new development and that proposals should instead respond to their setting through their appearance, scale and landscaping. Similarly, E12 requires new industrial development to achieve high building design standards and that siting and layout should take into account the possible need for future expansion. Policy CS3 requires sustainable construction measures to be deployed in non-residential developments, while CS5 demands high quality design that respects the local distinctiveness and the built heritage. Although CL24 relates to wind turbines in the countryside, it notes that particular care should be given to design, siting, and colour of ancillary facilities including transformers and transmission apparatus.

Suffolk Coastal policies

18.2. DM21 and DM22 set out the criteria for considering the layout and design of development within the District. It is expected that development should relate to the scale and character of their surroundings.

Key local issues

18.3. The potential height and scale of buildings and equipment within the proposed substation compound is of concern to the local community, notably in the Burstall area, and the local authorities. A secondary concern is the potential scale and appearance of the kiosks used for cable jointing (if required) and their location.

Adequacy of application

18.4. DCO Requirement 12 sets out the design parameters for the substation site which will comprise Work No. 67. The supporting Design and Access Statement confirms that the design principles established between the applicant and the local authorities for the East Anglia ONE project are equally applicable to the proposal now under consideration. The local authorities concur with this view however to ensure that the provisions of the Design Principles are adhered to and appropriate cross-reference in the DCO is required.

18.5 The Design Principles established for the East Anglia ONE project have been taken forward by the applicant in conjunction with the local authorities on a collaborative basis. Various design iterations have been produced and subsequently reviewed by the Design Council. The approach that has been followed to date is an example of good practice and subject to a similar arrangement being followed for this project the local authorities consider that the design and appearance of the onshore infrastructure can be appropriately managed to meet both national and local policy tests.

19. Summary

19.1. The local authorities have reviewed the application and evaluated the impacts in the context of the local development plans and other relevant policy. The majority of outstanding issues are likely to be resolvable through the discharge of requirements.

19.2. The one remaining issue of substance relates to socio-economics, where the local authorities do not believe the assessment of effects provided by the applicant is satisfactory in that it is likely to understate the sensitivity of the labour market and thus the impact of the project. Further discussions are ongoing on this matter and which we would hope to resolve in due course.

19.3. In all other areas, the local authorities broadly consider that the DCO in combination with the proper implementation of ancillary documents it provides for, and that the applicant is required to be bound by, will ensure that the impacts of the development are acceptable and thus it accords with local policy.

19.4. From the collective experience to date of the arrangements that are in place to discharge the relevant requirements attached to the East Anglia ONE order there is no reason to suggest that this will not be the case in relation to this project.