

The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 2 - 17 November 2020

Comments of Suffolk County Council as Public Rights of Way Authority

1. Comments on WRs

Not applicable.

2. Comments on responses to RRs

Not applicable.

3. Comments on LIRs

Not applicable.

4. Comments on any SoCG

ID	Topic	Statement	EA2 Ltd position	EA1N Ltd position	ESC position n/a	SCC position	Notes
LA-15.01	Existing Environment	Sufficient desk-based data has been collected to inform the assessment.	Agreed	Agreed		Not Agreed – under discussion	SCC notes that the Design Manual for Roads and Bridges (DMRB) is applicable.
LA 15-02	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects	Agreed	Agreed		Not Agreed – under discussion	Additional wording for the draft SoCG SCC considers that the Clarification Note does not answer its concerns.
LA 15-12	Schedule 4: Footpaths to be Stopped up	The alternative footpaths described in Schedule 4 (footpaths to be stopped up) of the draft DCO (APP-023) are appropriate.	Agreed	Agreed		Not agreed -under discussion	SCC also seeks clarity on how DCO article 10 will provide for the legal creation of the alternative PRow being provided in 2 stages as described in LA15-10. SCC also seeks confirmation that in the event of sequential development of the substations, that the second stage of the footpath creation would be implemented in a timely manner.

5. Comments on responses to the ExAs Written Questions (ExQ1)

ExQs 1	Question to:	Question:	1	2	Applicants Response	SCC Comments
1.9.21	Applicant	<p>Paragraph 6 says that there are “PRoW that fall within the onshore development area but which will not have an interaction with the proposed.... project and therefore are not subject to temporary control measures. This includes the Suffolk Coastal Path PRoW which crosses the onshore development area at landfall. Construction works ... are ... underground works only (specifically horizontal directional drilling), therefore there is no interaction ... and no temporary control measures are required.” Please a) explain what you mean by an interaction; b) list these PRoW; c) explain what measures you will take to avoid nuisance and ensure the safety, amenity and quiet enjoyment by those using them in the vicinity of the construction works, with particular reference to the Suffolk Coastal Path; and d) state where these measures are secured</p>			<p>a) Where the Applicants have stated ‘will not have an interaction’, this refers to not requiring temporary or permanent management measures as a result of the Project as they will not be directly impacted.</p> <p>b) All PRoWs within or adjacent to the onshore development area are shown on ES Figure 30.1 (APP438) and are listed in Table 30.7 in Chapter 30 Tourism, Recreation and Socioeconomics (APP-078). Note that the first column header of the table should read ‘PRoW ID No’. Only the footpaths outlined in the Outline PRoW Strategy (APP581) have an interaction with the Projects and will require management measures.</p> <p>c) and d) Practical and effective measures will be implemented by the Applicants to minimise nuisance to users of the PRoWs identified in the Outline PRoW Strategy (APP-581). The Suffolk Coastal Path crosses the onshore development area at the landfall. Construction</p>	<p>The proposed route of the England Coast Path (ECP) National Trail will be on the cliff top land covered by works area no 6. It is not clear if the applicants comments are referring to this proposed National Trail (not a designated PRoW) or to the public footpath which generally runs along the beach below the cliffs. ES Figure 30.1 does not show the proposed route of the ECP and it is not listed in Table 30.37.</p>

					activities at this location will be restricted to underground trenchless techniques only.	
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6. Comments on any additional information/submissions received by Deadline 1

The Clarification notes sets out those locations within the different chapters of the ES where the impact on Public Rights of Way were discussed. Although helpful as reference to these locations, the Note does not add any further information that changes the responses to the questions posed by SPR in the SOCG. The council would like to have seen an assessment that both listed and identifiably mapped each PRow, and assessed the impact on those PRow individually and as a local network, considering the physical resource and the amenity value to the users.

This is particularly pertinent at the substation site where the network is highly valued locally as a recreational resource with a high quality of experience for walkers and that will be permanently lost. The embedded mitigation, namely the provision of an alternative route for the footpath that will be subsumed under the substations, does not mitigate or compensate for the overall loss of the recreational amenity that walkers using any of the PRow in this area will experience as a result of the construction and future existence of the substation site.

7. Comments on Post hearing submissions

Not applicable.

8. Responses to any further information requested by the ExA for this deadline

Not applicable.