

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Submission of Oral Case

**Issue Specific Hearing 5 on 21st January 2021:
Social, Economic, Land and Sea Use Effects**

Applicants: East Anglia TWO Limited and East Anglia ONE North Limited
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Applicable to **East Anglia ONE North and **East Anglia TWO****



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Table of contents

1	Introduction	1
2	Agenda Item 2: Offshore Social and Economic Effects	2
2.1	Shipping, Navigation and Sea Use	2
2.2	Fishing and Fisheries	3
2.3	Recreational and Other Sea Uses	5
3	Agenda Item 3: Onshore Social and Economic Effects	6
3.1	Economic Benefits Including at a Macro and Micro Level	6
3.2	Potential Economic Disbenefits, Including Tourism, Land Use and Arts and Culture and Including Potential In-Combination and Cumulative Effects	16
3.3	Construction – Local Labour Markets and Local Issues Including Considerations of Other Potential Employment Heavy Construction Projects	23
3.4	Social Effects Including Access to Services and on the Tranquillity of the Countryside during Construction Phases	24



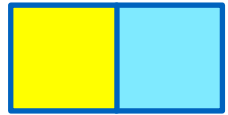
Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
BEIS	Department for Business, Energy and Industrial Strategy
BRES	Business Registrar and Employment Survey
CfD	Contract for Difference
CFWG	Commercial Fisheries Working Group
DCO	Development Consent Order
DMO	Destination Management Organisation
EA HUB	East Anglia Hub
EA1	East Anglia ONE Offshore Wind Farm
Eastern IFCA	Eastern Inshore Fisheries and Conservation Authority
EEEGR	East of England Energy Group
ExA	Examining Authority
FTE	Full-Time Equivalent
ISH	Issue Specific Hearing
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
NFFO	National Federation of Fishermen's Organisations
NPS	National Policy Statement
ONS	Office for National Statistics
ProW	Public Rights of Way
SoCG	Statement of Common Ground
TCE	The Crown Estate



Glossary of Terminology

Applicants	East Anglia ONE North Limited and East Anglia TWO Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO project Development Consent Order but will be National Grid owned assets.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO project Development Consent Order.
Projects	The East Anglia ONE North project and the East Anglia TWO project.



1 Introduction

1. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23 December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again.
2. The Issue Specific Hearing (ISH) 5 for the East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm Development Consent Order (DCO) Applications (references EN010077 and EN010078, respectively) were run jointly and took place virtually on 21st January 2021 at 10:00am (Hearings).
3. The Hearings ran through the items listed in the agendas published by the ExA on 8th January 2021. The Applicants gave substantive oral submissions the Hearings and these submissions are set out within this note.
4. Speaking on behalf of the Applicants were:
 - Mr Colin Innes, partner at Shepherd and Wedderburn LLP;
 - Mr Paolo Pizzolla, project director for EIA and consenting at Royal HaskoningDHV;
 - Mr Gero Vella, offshore consents manager for the Projects;
 - Mr Philip Watkins MBE, Director, Eastern Edge Ltd;
 - Mr Ross Ovens, project director of the East Anglia Hub made up of the Projects and East Anglia THREE offshore windfarm at ScottishPower Renewables;
 - Mr Charlie Jordan, project director for East Anglia ONE offshore windfarm (EA1) at ScottishPower Renewables; and
 - Mr Simon Cleary, economics director at BiGGAR Economics.



2 Agenda Item 2: Offshore Social and Economic Effects

2.1 Shipping, Navigation and Sea Use

5. Between application submission and submission of the draft Statement of Common Grounds (SoCGs) (in response to the Rule 9 Letter) on the 11th June 2020, the Applicants engaged with The Maritime and Coastguard Agency (MCA) and Trinity House on the applications for the projects and were able to close out the majority of matters, which included agreeing to several amendments to the **draft DCO** submitted at Deadline 3 (REP3-011). The only other outstanding matter as at 11th June 2020 related to data checks by the MCA on geophysical data acquired to support the EIA. The SoCG records that the initial checks did not identify any significant issues, but the full review process was delayed due to the COVID-19 pandemic. These positions are reflected in the **Statement of Common Ground with the Maritime and Coastguard Agency** (AS-047) and the **Statement of Common Ground with Trinity House** (AS-053) submitted on the 11th June 2020 and in the MCA's **Responses to the ExA's Written Questions (ExQ1)** (REP1-145) to Question 1.12.3.
6. Following submission of the updated **draft DCO** (REP3-011) at Deadline 3, the MCA and Trinity House confirmed that the agreed changes have been reflected in the updated draft DCO. However, both organisations have requested a few additional changes to the draft DCO. The Applicants are considering these requested changes and plan to engage with the MCA and Trinity House prior to Deadline 5. Any further changes that are agreed will be reflected in the next revision of the draft DCO due to be submitted at Deadline 5.
7. The data checks of the geophysical data acquired to support the EIA are still delayed due to the COVID-19 pandemic. The full checks are anticipated to be completed for Deadline 6 and confirmed through an update to the SoCG submitted at that deadline. However, should the data checks be delayed beyond this, the MCA are content for the checks to be confirmed post-consent.
8. This updated position with the MCA and Trinity House is reflected in the SoCGs submitted at Deadline 4 (**Statement of Common Ground with the Maritime and Coastguard Agency** (REP4-049) and **Statement of Common Ground with Trinity House** (REP4-045)).
9. The additional changes to the draft DCO requested by Trinity House and the MCA were resolved during a meeting with the Applicant on the 28th January 2021. The draft DCO to be submitted at Deadline 5 will be updated to reflect the agreed changes. Furthermore, updated Statements of Common Ground with each



organisation will be submitted at Deadline 5 noting that all matters with both organisations are now Agreed, subject to review of the updated draft DCO.

2.2 Fishing and Fisheries

10. The key commercial fisheries stakeholders are:

- The Commercial Fisheries Working Group (CFWG), which comprises representatives of the local fishing fleet located at fishing ports between Lowestoft, in the north and Harwich in the south;
- The National Federation of Fishermen's Organisations (NFFO) and National Association of Producer Organisations in Dutch Demersal Fisheries (VisNed); and
- The Eastern Inshore Fisheries and Conservation Authority (Eastern IFCA).

2.2.1 CFWG

11. A draft **Statement of Common Ground with the CFWG** (REP1-068) was submitted at Deadline 1. Outstanding matters at that point related to:

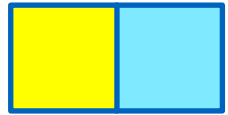
- Post-export cable installation fishing trials by trawl and drift net;
- Request for a commitment by the Applicant to discuss mitigation options should long line fishing trials in the constructed EA1 offshore windfarm demonstrate that the fishing technique is unviable during windfarm operation; and
- Mitigation options relating to cable exposure.

12. The Applicant and the CFWG engaged on and resolved these matters between Deadline 1 and Deadline 3 as evidenced in the updated SoCG submitted at Deadline 3 (**Statement of Common Ground with the CFWG** (REP3-079)). All matters with the CFWG are now Agreed.

2.2.2 NFFO and VisNed

13. The Applicants submitted a draft **Statement of Common Ground with the NFFO and VisNed** at Deadline 1 (REP1-067) and Deadline 4 (REP4-047). The current position is that:

- We are Not Agreed regarding the assessment methodology approach to determining 'magnitude of effect' and with respect to the cumulative impact assessment treatment of constructed projects as part of the baseline. In both cases, the NFFO and VisNed acknowledge that the Applicants have followed the industry standard approach, but they have issues with this approach, which is documented in the **draft Statement of Common**



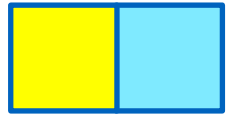
Ground with National Federation of Fishermen's Organisations and National Association of Producer Organisations in Dutch Demersal Fisheries (VisNed) (REP4-047). It is not expected that this position will change within the timeframe of the Examination.

- With regard to the assumption that beam trawling can resume within the operational windfarm, the Applicants and NFFO and VisNed are Not Agreed on the basis of the worst case scenario of minimum spacing of wind turbines (1200 x 800m). NFFO and VisNed acknowledge that should the nominal spacing of wind turbines be much greater than the worst case minimum spacing, the likelihood that significant levels of beam trawling can resume is greater, but in their view, this remains unproven. Ultimately, it is the decision of individual vessel skippers as to whether they resume fishing within the windfarms. It is not expected that this position will change within the timeframe of the Examination.
- There was an outstanding concern in the Deadline 1 SoCG (REP1-067) regarding whether long line fishing could resume in the operational windfarms. As this matter primarily affects the local fishing fleet, the Applicants and our parent company, ScottishPower Renewables, have agreed with the CFWG that long line trials will be undertaken within the operational EA1 offshore windfarm. Should these trials show that long lining is unreasonably affected, the CFWG forum will be used to discuss mitigation options (see agreement in **Statement of Common Ground with the CFWG** (REP3-079)). Accordingly, this matter is now agreed with the NFFO and VisNed, as shown in the updated SoCG submitted at Deadline 4 (REP4-047).
- All other matters are either Agreed or the NFFO and VisNed acknowledge the Applicants position.

At OFH 6, Mr Trevor Andrews, representing the Harwich Harbour Fisherman's Association, confirmed that he had had dealings with companies related to the Applicants and they have delivered on the commitments made.

2.2.3 Eastern IFCA

14. The Applicants submitted a draft **Statement of Common Ground with the Eastern IFCA** on 11 June 2020 (AS-055) and Deadline 1 (REP1-081). With regard to commercial fisheries, the current position is that all matters are Agreed with the exception of cumulative impacts where we are Not Agreed. Eastern IFCA has raised concerns about the scale of offshore development in the Southern North Sea and consider the assessment of cumulative impacts for the Projects should be enhanced by a regional study to examine potential overall impacts of offshore activities including wind farm related works, aggregate extraction and



demersal fishing on inshore fishing activities in the Southern North Sea. This position is consistent with the Eastern IFCA advice for other offshore wind farm projects.

15. The Applicants acknowledged the increasing concern regarding potential cumulative impact of offshore windfarms and other activities including oil and gas and conservation (such as Marine Conservation Zones) on commercial fishing. However, the Applicants are of the view that such regional-scale studies are beyond the scope of the Projects and would be better suited through programmes such as the Department of Business, Energy and Industrial Strategy (BEIS) Strategic Environmental Assessment (SEA) Research Programme, the Marine Management Organisation (MMO) or The Crown Estate (TCE) Enabling Actions Programme. The Applicants' parent company, ScottishPower Renewables has a clear track record of supporting and contributing to such strategic studies.

2.3 Recreational and Other Sea Uses

16. The Royal Yachting Association and the Cruising Association, who the Applicants engaged with pre-application, both confirmed by email (14th April 2020 and 13th March 2020 respectively) that they did not require engagement on statements of common ground with the Applicants.



3 Agenda Item 3: Onshore Social and Economic Effects

17. Section 5.12 of EN-1 confirms that a very broad range of socio-economic impacts are likely to be relevant and it identifies that this also relates to the matters set out in Parts 2 and 3 of the National Policy Statement (NPS). The Applicants have previously addressed the strong policy support that these sections of the NPS provide. The Applicants at the hearing sought to illustrate how these projects would assist in delivering employment and economic activity at both the macro and micro level. Mr Philip Watkins set out the Regional context and how these projects were critical to the further development of the Regional supply chain. Mr Charlie Jordan set out what had been achieved through the development of East Anglia One. Mr Ross Ovens explained how SPR had responded to the Government's enhanced offshore targets. The East Anglia Hub concept was established to bring forward three projects through a single procurement and delivery programme. This would maximise the opportunities for the macro and micro supply chain.

3.1 Economic Benefits Including at a Macro and Micro Level

3.1.1 Economic Benefits at a Macro Level

18. In 2005, the East of England had just 60MW of offshore generating capacity¹ and by 2010 it could still only boast 232MW². Today, the UK has 10.4GW³ of offshore wind. Of this, over 4GW⁴ is off our coastline and a further 3.2GW⁵ is already consented. This investment has made a real contribution to the sustainable regeneration of our coastal communities.

3.1.1.1 How the East of England seized this investment opportunity

19. A key factor was the coincidence of geography and government policy. The government's desire for low carbon electricity met excellent wind resource, and shallow waters off the energy coast of Norfolk, Suffolk and Essex.
20. Offshore Wind Leasing Round 1 had seen the first offshore wind farms in the region with Scroby Sands off the Norfolk coast, and Gunfleet Sands off the Essex coast. Local companies provided fabrication, assembly and project management

¹ Scroby Sands 60MW.

² Gunfleet Sands 172MW.

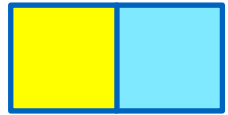
³ Source: RenewableUK

⁴ Source: 4C Offshore. Comprises: Lincs 270MW, Inner Dowsing 97MW, Lynn 97MW, Dudgeon 402MW, Race Bank 573MW, Sheringham Shoal 316MW, East Anglia ONE 714MW, Scroby Sands 60MW, Galloper 353, Greater Gabbard 504MW, Gunfleet Sands 172MW, London Array 630MW.

⁵ Source: 4C Offshore. East Anglia THREE 1,200MW, Norfolk Vanguard 1,800MW



- services and the ports benefitted providing logistic support, including small ports such as Brightlingsea in Essex.
21. Another key to understanding how the East of England captured so much economic activity is that the Oil and Gas sector which already possessed many transferable skills required by offshore wind developers. Seabed survey vessels, offshore fabrication facilities, inspection, repair and maintenance services, scour protection services could all quickly move from oil and gas into the renewables sector.
 22. Where there were gaps in the supply chain, new enterprises appeared. Monopile and jacket installation vessel companies; specialist Crew Transfer Vessels (many were built and operated locally); recruitment companies; research and intelligence consultancies; and training enterprises were established along the “energy coast”.
 23. The public sector was active too, adopting economic development policies and plans that strongly supported offshore wind. Momentum gathered and cooperation and coordination across electoral boundaries was increasingly evident.
 24. In 2006 Suffolk County Council, and East Suffolk Council’s predecessor, Waveney, combined with Norfolk local authorities the East of England Development Agency and English Partnerships to fund a private-sector-led Urban Regeneration Company, known as 1st East. 1st East was specifically tasked with attracting new investment to the most deprived areas of Lowestoft and Great Yarmouth which included the ports. Capturing offshore wind activity became a priority. 1st East then combined with a similar regeneration organisation addressing deprivation in Harwich. Together they marketed not just single projects, or single towns, but the combined offer of the Essex Suffolk and Norfolk energy coast.
 25. The tempo of collaborative working across county boundaries, and the public and private sectors working more closely, increased significantly after 2010. The catalyst was three-fold. First, the Offshore Wind Leasing Round 2 projects were now coming onstream. Second, The Crown Estate had awarded the licences for Offshore Wind Leasing Round 3 and so significantly expanded the market. Third was the coalition Government’s creation of Local Enterprise Partnerships.
 26. By any measure, the New Anglia Local Enterprise Partnership (NALEP), has been one of the country’s most effective. Energy and Ports were identified as priority sectors. They led successful national bids including for sites in Lowestoft and Great Yarmouth to be designated as an Enterprise Zone focused on attracting energy-related businesses.



27. Promoting the supply chain's capability was a recurring theme. The East of England Energy Group, an all-energy membership organisation known as EEEGR, organised events such as the Southern North Sea conference in Norfolk, and an annual reception at the House of Commons reception, hosted by local MPs, and where the supply chain, local authority leaders and the business organisations met senior government Ministers.
28. The period of 2010-15 saw an increase of tactical promotional bodies promoting the region. One of particular note was the Suffolk Energy Coast Delivery Board (SECDB) created by The Rt Hon Thérèse Coffey MP. The SECDB brought together the offshore wind and nuclear interests located in her constituency and very much strengthened the energy coast brand. A unique feature of the SECDB is that it attracted the direct involvement of BEIS.

3.1.1.2 Policy and Commitments

29. At a national level, the offshore wind sector worked closely with the government. In November 2017, the government published its Industrial Strategy which aimed to put the UK at the forefront of the industries of the future, one of which was identified as 'Clean Growth'. Within the Industrial Strategy was the idea of negotiating sector deals and in March 2019, the national Offshore Wind Sector Deal was signed, in Lowestoft, by the Energy Minister and industry representatives.
30. The Sector Deal identified £557m of government support offered through the Contract for Difference bidding rounds and in return, the sector committed to several 2030 targets. These included increasing the amount of UK content to 60%; increasing the representation of women to at least one-third; investing £250m in building a stronger supply chain; and increasing exports to £2.6bn per annum.
31. The UK was the first major economy to enter a commitment into law to achieve net-zero carbon emissions by 2050. The government's Energy White Paper published in December 2021 heralds the concept of a Green Industrial Revolution with the idea of orientating the UK economy towards zero-carbon goods and services and gaining a global strategic advantage in this transition.
32. 'Build Back Greener' and the '10-point plan' includes the Prime Minister's pledge to power every UK home with electricity from offshore wind farms by 2030. It raises the offshore wind target to generating 40GW by 2030 – an increase of 10GW over the Sector Deal target.

3.1.1.3 [Companies and Investment]

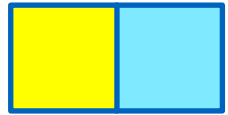
33. The UK is recognised as the world leader in offshore wind and the East of England coast is a source of world-renowned expertise and is a beacon for



- investment. The region has hosted many international delegations from as near as Ireland and as far as Canada and China.
34. Meanwhile, international developers, Tier 1 companies, infrastructure funds, pension funds and asset managers have all beaten paths to our region. Examples include Marubeni, Sumitomo, Mitsubishi, Macquarie, Worley and China Resources National these, and many more, have invested in East Anglian companies or projects.
 35. Inward investment creates more jobs as capital is released for new projects. This virtuous circle has other regeneration spin-offs with the growing energy sector has been heavily referenced in successful bids to government for infrastructure projects such as the new bridges for Great Yarmouth and Lowestoft. The new CEFAS HQ, the Offshore Wind Skills Centre and the SPR Operations and Maintenance base are examples in Lowestoft.
 36. Meanwhile, local companies, used to working in the North and Baltic Seas on Danish, German, Belgian, Dutch and French projects, are now exporting their services and expertise to the coastal waters of the US, Taiwan, China, Vietnam and Japan.
 37. In 2017 Aura⁶ reported that in the UK there were 10,000 full-time equivalent (FTE) jobs in offshore wind. Their projections were that by 2032, this could rise to 21,000 FTE jobs, with an additional 37,000 Indirect and induced jobs.
 38. In October 2020 the London School of Economics published a report entitled “Jobs for a Strong and Sustainable Recovery from Covid-19”⁷. It identifies a programme that is required for a domestic economic recovery that is strong, sustainable, inclusive and resilient. The report prominently acknowledges the role that offshore wind must play.
 39. Offshore wind is a huge success story for the East of England. In the last 20 years the sector has contributed significantly to the regeneration of the coastal communities by attracting investment, creating jobs, developing skills and exporting worldwide. The region stands as an exemplar for delivering the government’s economic strategies and the vision of a low carbon future.

⁶ Aura (2017), Future UK Employment in the Offshore Wind Industry, available at: <https://aura-innovation.co.uk/wp-content/uploads/2020/04/Cambridge-Econometrics-Future-UK-Employment-in-Offshore-Wind-June-2017.pdf>

⁷ London School of Economics and Political Science (2020), Jobs for a Strong and Sustainable Recovery from COVID-19, available at: <https://www.lse.ac.uk/granthaminstitute/publication/jobs-for-a-strong-and-sustainable-recovery-from-covid-19/>



3.1.2 Economic Benefits at a Micro Level

3.1.2.1 East Anglia ONE Offshore Wind Farm (EA1) - Mr Charlie Jordan

40. EA1 features 102, 7MW Siemens Gamesa Wind turbines, with the capacity to produce 714MW of clean energy. SPR's ambition as the developer of this project was clear, to deliver enough clean, renewable energy to power the equivalent of more than 630,000 homes alongside creating industrial, economic and educational benefits for the local communities.

3.1.2.1.1 Local Content

41. EA1 committed to a UK content target of 50% in 2014 upon the submission of the EA1 Supply Chain Plan. Now, although the document may be almost seven years old, within it, ScottishPower Renewables was able to establish a framework for competitive delivery that would see the project through to construction, completion and operation. For EA1, ScottishPower Renewables is recording over 50% UK content over the lifetime of the project.

42. The local supply chain has been integral to the delivery of the EA1 project. During the construction phase of EA1, investment in companies working locally in East Anglia exceed £76m. The range of local suppliers engaged on the project were in the form of established engineering companies and also companies transitioning in from a traditional Oil and Gas background – such as JFMS, 3Sun etc. We would not have achieved the success realised without the support of local companies.

43. In addition to construction services the local investment on supporting services including media support, catering, office supplies, resources totals to date at £13.79m.

44. EA1 is now in its operational phase and the value of contracts awarded to organisations working in East Anglia is above £24m. The investment figure includes, but is not limited to, the balance of plant services, the tool framework, forklift hire etc, which are all local entities.

45. In this year alone (2021), EA1 has awarded works in excess of £108,000.

46. As part of EA1, ScottishPower Renewables has supported the investment £30m in local ports, £5m on the Port Infrastructure at Great Yarmouth and £25m at Lowestoft in creating a world class facility for supporting the operations of the windfarm.

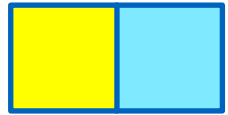
47. ScottishPower Renewables' investment with companies working locally exceeds £140m directly, but in addition to that there has been much more relating to companies working indirectly within the supply chain that are not included within this figure. The installation of EA1 completed in summer 2020 and sight should not be lost of the next 25-30 years of operations and maintenance that is required



for the windfarm and the continued local benefits that will come with that programme of activity.

3.1.2.1.2 Skills and Education

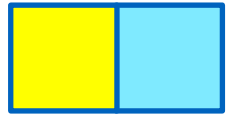
48. Since 2017, ScottishPower Renewables has been working to deliver on the key commitments of the skills strategy identified initially within the consent for EA1 and additionally within the EA1 Supply Chain Plan mentioned above.
49. The principles of those commitments were to utilise existing parent company skills programmes where and when possible, to make the best use of existing local and national education and skills infrastructures and add value to these where appropriate and to promote employment and re-skilling opportunities in the communities most closely associated with the development of EA1.
50. In the last four years ScottishPower Renewables has invested over £500,000 in the East Anglia Skills landscape. This has seen a programme of work which started as career talks, STEM workshops, promotion of graduate opportunities and local skills groups support turn into a strategy that has surpassed targets initially set and delivers year on year.
51. We have worked alongside Suffolk County Council, local groups such as Skills for Energy, the STEM Hub and educational institutions such as the University of East Anglia and East Coast College to contribute and add value as much as possible.
52. Key aspects of ScottishPower Renewables' involvement locally include:
 - **Offshore Wind Skills Centre** - £79,800 donation sponsoring 26 places for individuals looking to pursue careers in offshore wind sector. The courses offered focus on retraining experienced engineers from wider offshore or engineering sectors to work in offshore wind.
 - **Masters Scholarships** – ScottishPower Renewables has invested over £200,000 to support Master Scholarships at the University of East Anglia. ScottishPower Renewables has three of the previous University of East Anglia Scholars working in ScottishPower Renewables as part of the graduate programme. Another student that benefited from the programme is currently working on EA1 as the assistant site manager.
 - **Internship Opportunities** – working alongside John Best and The Ogden Trust in delivering the East Coast Energy Internship to students based in East Anglia.



- **Kit Donation** – ScottishPower Renewables has delivered and donated decommissioned Wind Turbine Generating equipment to the Engineering department at East Coast College.
 - **East Coast college relationship** – ScottishPower Renewables has continued to sponsor the Offshore Wind Skills Centre which aims to retrain experienced engineers from wider offshore or engineering sectors to work in offshore wind. To support the wider engineering educational offering at East Coast College, ScottishPower Renewables has also donated a decommissioned wind turbine generator
53. ScottishPower Renewables aspires to improve diversity in the region and has invested over £17,000 in the support of local International Women in Engineering Day events across East Anglia, engaging with over 1,000 young women, sharing industry knowledge and opportunities.
54. Focusing on early education, ScottishPower Renewables partnered with Cambridge Science Centre to create, develop and deliver Cosmo-Science based workshops to over 3,200 primary aged students across East Anglia to support STEM learning.
55. In 2020, ScottishPower Renewables created its first Offshore Wind Apprenticeship Programme. It has always been in the planning for a programme of this kind and achieving the major milestone of commissioning the EA1 windfarm allowed ScottishPower Renewables to commence with the recruitment. Both apprentices Hope and Jovita joined the organisation in November and are enrolled at East Coast College on a three-year Mechatronics maintenance technician apprenticeship pathway. ScottishPower Renewables looks forward to the continuation of this programme in 2021 and beyond. In addition to the two ScottishPower Renewables apprentices working on EA1, O&M service provider Siemens currently have 6 apprentices working on site.

3.1.2.1.3 Jobs and Employment

56. The Operations and Maintenance facility in Lowestoft has created over 100 skilled long-term jobs for the 30-year life expectancy of the windfarm. All employees working on the site come from within a 30 mile distance to the base.
57. Upon completion of the recruitment for EA1, a retrospective analysis of positions was carried out and the information shared with both East Coast College and Suffolk County Council. This enables invested stakeholders to understand the training and experience gaps for local individuals and provide vital information to enhance future local training offering to, in turn, up-skill local people for employment in the offshore wind sector.



58. During the construction of EA1, over 820 highly skilled construction jobs were carried out on the onshore works alone, and many more local people worked on the windfarm offshore.

3.1.2.1.4 Conclusion

59. In summary, to date EA1 has directly facilitated direct investment locally in East Anglia of over £145m. The multi-objective skills outreach has engaged over 4,200 young people across the East Anglia region and has created 100 long term local jobs for the 30-year life expectancy of the windfarm.

3.1.2.2 East Anglia Hub (EA Hub) - Ross Ovens

60. ScottishPower Renewables is proposing a concept called the EA Hub, which brings together the Projects and the East Anglia THREE offshore windfarm into a single procurement and delivery programme. Each of the three projects remain independent projects and separate legal entities. The EA Hub is about optimising the procurement and delivery of these projects.

61. This new concept aims to deliver 3.1GW of green energy which is enough to power around 2.7 million homes, making a significant contribution to the UK's targets.

62. During this early phase of the project, the EA Hub currently employs 140 FTEs in the UK and this will increase to around 190 by the end of 2021, of which, around 35 are local to the East of England region.

63. The EA Hub has also spent just over £1.6m locally over the past 12 months alone on project related activity, so the EA Hub is already delivering benefits to the local area.

64. ScottishPower Renewables has created the EA Hub concept to:

- bring forward the delivery of these projects which will help support the UK's ambitions of achieving 40GW of offshore wind by 2030, of which the EA Hub would contribute 7.5%;
- accelerate decarbonisation of the economy and progressing towards net zero by 2050;
- reduce the overall cost of offshore wind by leveraging the scale of the EA Hub. The EA Hub can create benefits and optimisations by delivering these three projects in a single programme; and
- help to power a green recovery post-COVID and post-BREXIT. By building all three projects at once the EA Hub can quickly create jobs and local benefits by reducing construction time and increasing opportunities for the UK supply chain.



3.1.2.2.1 Securing the Programme

65. The EA Hub plans to secure all major suppliers ahead of the next Contract for Difference (CfD) round. To facilitate this strategy, some have already been selected in 2020 such as Siemens Gamesa.
66. This early selection of suppliers allows the EA Hub to work more closely with the supply chain to ensure competitiveness going into the next CfD auction and, aligned with the government's Industrial Strategy objectives to create sustainable and competitive supply chains. This will allow the UK and local companies valuable time to gear up for these projects rather than it being a rush to construction, which in turn will create more opportunities for UK supply chain companies.
67. In terms of enabling the programme, the Applicants have applied to National Grid to adjust the connection dates to align with the programme for the EA Hub. The new connection agreement has been signed for East Anglia TWO and the Applicants are expecting to sign the new connection agreement for East Anglia ONE North in March 2021.

3.1.2.2.2 Benefits to the UK and Local Supply Chain

68. The Applicants are bringing forward these projects to help the government meet their 2030 offshore wind targets and to support the Industrial Strategy priorities which include:
 - boosting competitiveness and productivity;
 - harnessing innovation; and
 - investing in skills and driving regional growth.
69. The overall CAPEX of the EA Hub is expected to be around £6.5bn. The EA Hub's objective is to build on the successes of EA1 in terms of delivering jobs, skills opportunity and UK content.
70. The EA Hub is expecting to achieve in excess of 50% UK content with an aspirational target of 55%, which is working towards the Offshore Wind Sector Deal target of 60% by 2030.
71. The EA Hub will build on the success of EA1, which sustained almost 3,500 jobs at the peak of construction and delivered 100 directly employed long-term skilled jobs and numerous indirect jobs. These indirect jobs would be in areas such as:
 - Vessel crew;
 - Port services;



- Hotel and catering;
- Office facilities and services; and
- Restaurants and general services.

72. Therefore, these projects are expected to have a significant benefit to the UK and the local area.

3.1.2.2.3 Skills

73. In July 2020 a Memorandum of Understanding (MoU) was signed by East Suffolk Council, Suffolk County Council and ScottishPower Renewables. The MoU demonstrates a commitment from the three parties and aims to:

- promote employment and re-skilling opportunities;
- work in collaboration to maximise the benefit of education, skills and employment; and
- support local suppliers with the potential to enter the offshore wind supply chain.

74. ScottishPower Renewables is continuing to work with EEEGR to provide regular project updates, promote local opportunities and support local events such as the Southern North Sea conference where ScottishPower Renewables has continued to be a key sponsor.

75. In the past 12 months ScottishPower Renewables has delivered two online webinars with EEEGR to update the local supply chain on the projects and provide information on how they can get involved, with further events planned through this year.

76. Despite the EA Hub not yet being in execution, ScottishPower Renewables have already committed to a number of skills initiatives which has ranged from:

- taking students on tours of local pre-assembly works;
- launched apprenticeship programme;
- sponsoring the Offshore Wind Skills centre;
- delivering a virtual course with East Coast Energy Internship; and
- agreeing to fund the Skills for Energy Website upgrade.



3.2 Potential Economic Disbenefits, Including Tourism, Land Use and Arts and Culture and Including Potential In-Combination and Cumulative Effects

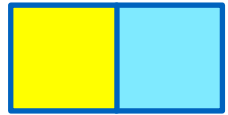
3.2.1 DMO Report

77. The destination management organisation (DMO), The Suffolk Coast, commissioned a survey⁸ in 2019 of visitors and potential visitors to assess the impact on tourism from the construction of the proposed Sizewell C power station and the Projects.
78. This survey estimated that the development of these energy assets could cost the tourism industry £24m due to a 17% net reduction in the number of visitors to the area. This value should not be considered an evidence-based conclusion because the process of arriving at this figure is fundamentally flawed.
79. The perception-based study approach taken in the DMO report does not provide robust evidence of changes to future behaviour. The approach was based on the respondents predicting changes in their behaviour at a future date. Studies^{9,10} have found that individuals are generally poor predictors of their future behaviour and are better at predicting the behaviour of others. People are unlikely to consider all the factors that will influence their behaviour in the future but will instead focus on their current situation and intentions at the point of being asked the question. What this means for the DMO report is that the individuals' predictions of their behaviour are likely to be less accurate than if individuals had been asked to predict how other people would react to the Energy Coast developments. The respondents are likely to have overstated how they would react to any potential negative impacts because at the time of questioning the focus was on perceived deterrents, rather than the reasons why they would choose to visit.
80. The Applicants submit there are additional methodological issues with the DMO report which undermine its conclusions regarding the Projects. In particular:
- the deterrents presented to respondents were not relevant for the offshore wind farms. The survey was completed before the Environmental Statements were submitted in October 2019. The deterrents that were provided to respondents were considered in the Environmental Statements and the majority were found not to be issues for the Projects. For example, traffic issues were identified as the greatest deterrent in the

⁸ <https://www.thesuffolkcoast.co.uk/tourism-research-and-reports>

⁹ Balcetis, E., and Dunning, D. (2011). Considering the situation: Why people are better social psychologists than self-psychologists. *Self and Identity*, 1-15 DOI:

¹⁰ Poon et al, (2014) On the psychology of self-prediction: Consideration of situational barriers to intended actions. *Judgment and Decision Making*, Vol. 9, No. 3, May 2014, pp. 207–225



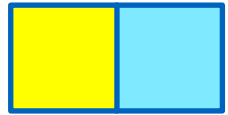
DMO survey, but the traffic assessment in the Environmental Statements, of projects not in the cumulative context, assessed the impacts as negligible or minor;

- the stimuli provided to enable respondents to predict their behaviour did not describe the changes to landscape or visual impact. To test what survey respondents might think of landscape character or visual impact impacts it is necessary to use stimuli which show how the landscape might change. These have not been provided. The stimuli provided described the location of the infrastructure, rather than the landscape or visual impacts. The geographic coverage of the stimuli associated with the construction of the onshore infrastructure only related to a small proportion of the area that potential visitors were asked about. No stimuli were provided that focused on the construction of the offshore wind farm, either the offshore or onshore elements. It is difficult therefore to see how survey respondents could have been in a position to talk about changes in their behaviour from the stimuli provided; and
- the impacts from the construction of the offshore windfarms and the Sizewell C power station were grouped together, despite the impacts being significantly different. Potential visitors have been found to be more likely to avoid the area during the construction period of Sizewell C on its own than the combined potential impact of Sizewell C and the Projects.

81. Any one of these three issues on their own would be enough to invalidate the conclusions of the DMO report with respect to the offshore wind farm. Therefore, the evidence presented in the DMO report does not support the conclusion that the construction of the wind farm would negatively impact visitor spending.
82. The main concerns raised in the DMO Report were disruption to the natural beauty of the area, and traffic and congestion; notably most participants travelling to the Suffolk Coast by car (79-97%). The main concerns voiced by visitors and businesses were similar - loss of tranquillity, traffic congestion, loss of Area of Outstanding Natural Beauty, damage to habitats and road obstructions. These concerns also match those raised by the DMO to the Applicants in pre-application consultation. All of these concerns are impacts assessed within the Project EIA.
83. The reported concerns regarding operation effects (onshore or offshore) in the DMO Report are less than that during the construction period. This supports the assumptions within the EIA on long term tourism effects.

3.2.2 Sizewell C Tourism Perception Study

84. A similar tourism perception study was conducted for Sizewell C and was submitted as part of its Environmental Statement. This survey was undertaken



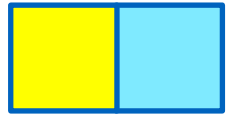
by Ipsos MORI in 2019 and considered responses from over 3,000 people. After being presented with details about the Sizewell C project and its construction, 39% said that they were less likely to visit the area during its construction and 8% say they were more likely to visit. The DMO survey asked respondents to consider both the Sizewell C project and the Projects. When asked to consider both, only 29% of respondents said they were less likely to visit the area during the construction period and 12% were more likely to visit the area.

85. The net effect increases from -31% when Sizewell C is considered on its own to -17% when the Projects are included. This shows that the negative perception of the development of the 'Energy Coast' is as a result of the Sizewell C project, not the offshore wind farms. This would also imply that either the inclusion of the Projects in the survey makes visitors more likely to visit the area or there is an issue with the wider methodology and approach of the perception-based studies.
86. It should be noted that the developers of Sizewell C do not expect the reported perceptions of potential visitors and their reported likelihood to visit the area to affect actual behaviour. The Environmental Statement for Sizewell C considered the behaviour of visitors during the construction periods of Sizewell B and Hinkley Point C nuclear power stations and found that there was no empirical evidence that the construction of these plants had a substantial effect on the sector. It is acknowledged that there may be some specific local issues and a Tourism Fund has been proposed to mitigate against these issues. At a local scale the residual effects on the tourism accommodation sector have been assessed as negligible to minor adverse (Not Significant).

3.2.3 BiGGAR Review

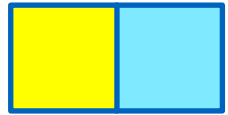
3.2.3.1 Analysis of Employment in Areas with Coastal Windfarms

87. The Applicants commissioned BiGGAR Economics to undertake a tourism impact review to identify, if any, evidence that the construction of offshore wind farms, and their associated onshore infrastructure, had an impact on the tourism economy in the local area. This involved two approaches:
 - The first was to consider the DMO report in more detail to assess how robust the findings of this study were with regards to the construction of the Projects. In particular the approach was to consider if the methodology used justified the conclusion of a 17% reduction in visitor numbers and £24 million reduction in revenue with regards to the construction of the Projects.
 - In addition, BiGGAR Economics considered empirical evidence from similar situations to identify the effect, if any, that the construction of offshore windfarms had on the tourism sector. This new evidence provides a strong empirical base to predict the impact that the construction of the



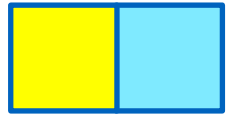
Projects will have on the tourism economy that was the subject of the DMO report.

88. If impacts arising from offshore wind farms, such as landscape character or visual impacts, lead to changes in visitor behaviour or spending, it would be expected that there would be evidence of such changes in other areas where there has been offshore wind farm development. BiGGAR Economics, therefore, analysed indicators of the tourism economy in 11 comparable areas, including one other Area of Outstanding Natural Beauty and one National Park, to identify any relationship between offshore wind impacts and changes in visitor behaviour or spending during the construction period.
89. Each area is unique and has a specific set of attractions and visitors. In determining if areas were comparable, and therefore suitable to be included in the analysis, it was necessary to consider the broad characteristics of each area and what happened in each area during the construction of an offshore wind farm. Two criteria therefore had to be met to consider the areas comparable:
- Are the effects of construction comparable with the Proposed Development?
 - Is the sensitivity of the tourism economy in these areas comparable to that in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)?
90. The areas were comparable because the effects that the construction of an offshore wind farm, and its associated onshore infrastructure, would have on the area and the sensitivity of the visitors to these areas are comparable to the Suffolk Coast and Heaths AONB. Specifically:
- the effects are comparable because:
 - all areas experienced civil engineering works, including the construction of a cable route and onshore substation. The effects that each area would experience would be similar in magnitude and type;
 - the offshore wind turbines will also be visible from these locations;
 - visitor sensitivity is comparable because
 - the primary motivations for visitors to the areas are outdoor activities, the seafront and arts/culture; and
 - the primary market for visitors is UK tourists, in particular older visitors who visit for the countryside and to visit small towns.



91. Data on second home ownership, is published using analysis of council tax returns¹¹. This shows that in 2018 and in the local authority districts considered between 0% and 10% of the dwellings were registered as second homes for the purposes of council tax. The value for Suffolk Coastal was 5%. This has not been considered when determining comparability because it is unclear how this affects visitor sensitivity, in either the behaviour of the owners or those who they rent out the accommodation to on a self-catering basis.
92. The analysis considered percentage changes in behaviour and therefore the scale of the visitor economy was not a relevant factor in determining comparability.
93. The two areas of landscape designation are particularly comparable because the focus on the natural environment for the visitor economy would suggest the sensitivity of visitors to changes in the natural environment would be similar.
94. To identify changes in visitor behaviour during periods of construction it was necessary to identify a dataset that would show evidence of a change in visitor spending within a local authority. Therefore, the data needed to be:
 - published annually;
 - published at the level of district local authority;
 - published by industrial sector;
 - directly linked to visitor spending; and
 - sensitive to change.
95. The source of this data is the Business Registrar and Employment Survey (BRES), which is undertaken each year by the Office for National Statistics (ONS). This survey involves engaging with approximately 80,000 business across the UK and this high sample size allow the ONS to publish statistics at the level of District Local Authority with a high degree of confidence.
96. Data was considered at a district authority level for three reasons:
 - data has to be accurate and there is a higher degree of confidence in data at district authority level, than at lower levels such as electoral wards;
 - the data would have to be focused enough to pick up changes in behaviour around areas of activity linked to the construction of offshore wind farms and their onshore infrastructure. Therefore, district authorities were

¹¹Ministry for Housing, Communities & Local Government (2019) Council Taxbase 2018 in England, available at: <https://www.gov.uk/government/statistics/council-taxbase-2018-in-england>



selected due to the rather than county local authorities to identify changes in behaviour; and

- the level of employment in Suffolk Coast and Heaths AONB was estimated in 2017 to be 3,693¹². This level of employment is comparable with local authority districts across the UK, which had a median level of employment in Accommodation and Food Services of 4,500 in 2017. Therefore, the scale was appropriate.

97. Alternative data sources identified during this process were:

- the Great British Tourism Survey¹³ does provide estimates of visitors spend by local authority. However, this data is averaged across three years and therefore it is not possible to use in this detailed time series analysis;
- the UK Business Count¹⁴ does provide the relevant data, however, the level of business birth and death is less sensitive to change than employment, and therefore the Business Register and Employment Survey was preferred. The UK Business Count data was used to sense check the analysis.

98. The analysis focused on employment change in the tourism-related sector during the construction period. It also considered changes in long-term employment and changes in employment in the wider region to assess whether the construction of offshore wind farms might have had an impact on visitor spending.

99. The analysis considered the trends in tourism-related sector employment in the two other areas of landscape designation in which onshore infrastructure had been constructed for an offshore wind farm that had been constructed between 2009 and 2018. The analysis found:

- during the construction phase of these offshore wind farms, tourism-related employment trends followed the trends in the wider region during the construction phase(s); and
- over the longer term, the growth in tourism-related employment within these regions was higher than or in line with their wider region.

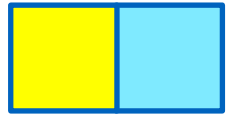
¹² Destination Research (2018) Economic Impact of Tourism Suffolk Coast and Heaths AONB 2017, available at: <https://www.thesuffolkcoast.co.uk/shares/Economic-Impact-of-Tourism----Suffolk-Coast--Heaths-AONB---2017.pdf>

¹³ Visit England (2019) The GB Tourist – 2018 Annual Report, available at: https://www.visitbritain.org/sites/default/files/vb-corporate/40413193-260c_gb_tourist_annual_report_2018_fv-v3.pdf

¹⁴ ONS (2019) Inter Departmental Business Register



100. The analysis considered the trends in tourism-related sector employment in nine other comparable coastal local authority districts. An offshore wind farm had been built near each of these districts between 2009 and 2018, and onshore infrastructure was constructed in each district as part of these offshore wind projects. The analysis found that during the construction phase of these offshore wind farms:
 - six of the nine districts experienced a higher rate of tourism-related employment growth than their long-term average, in the remaining three areas it was lower; and
 - tourism-related employment growth was higher than the regional level in four districts and lower in five.
101. The key finding was the tourism employment trends in the studied areas did not suggest any relationship with the construction of the offshore wind farms, for either designated landscapes or other coastal areas. Typically, employment changed in line with the wider region during the construction period.
102. Although the alternative data sources did not provide a robust evidence base, they were considered to identify potential indicators of evidence contrary to our conclusions based on employment data. The Great British Tourism Survey data was considered on aggregate across the district authorities by indexing the average three-year period that contained the most offshore wind farm construction activity. This would identify if there was a common trend between estimates for visitor numbers in these districts and periods of offshore wind farm construction. This analysis did not find evidence that contradicted our conclusions based on employment data. It found that the estimated average visitor numbers were 7% higher during the main three-year period of offshore wind farm construction than the average across 2011 – 2019.
103. The data in the Great British Tourism Survey does include estimates for business and leisure tourism. However, these are less reliable than overall estimates at district authority level and have not been analysed as part of this assessment.
104. BiGGAR Economics has significant experience in both the energy and tourism sectors across the UK. This includes an understanding of how these sectors operate individually and in relationship to the other.
105. The results of this study reflect findings from other studies BiGGAR Economics has undertaken regarding renewable energy developments and tourism, specifically our 2016 and 2017 studies of the tourism employment trends around onshore wind farm developments. These studies assessed tourism related employment trends around 28 wind farms constructed between 2009 and 2015. They found that there is no relationship between the development of onshore



wind farms and tourism employment at the local authority level nor any of the areas immediately surrounding wind farm developments.

3.2.4 Cumulative Impact Assessment

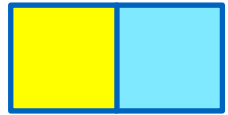
106. In terms of direct and indirect impact, Suffolk County Council and East Suffolk Council are content with the baseline and scale of the assessment. Whilst there will be localised impacts, mitigation measures outlined in the certified documents mitigate those impacts (covering concerns such as air quality, noise, traffic and transport, etc).
107. The Applicants' commitment to parallel ducting set out in **Project Update Note** submitted at Deadline 2 (REP2-007) will reduce disruption, as would the Applicants' preferred approach to crossing the Sandlings SPA by using an open trench method which would be quicker and reduce footprint impacts.
108. The Applicants have always accepted that there is potential for cumulative impact with Sizewell C, but no significant impact from the Projects. Sizewell C was included within the Applications assessment (APP-078). There have been updates for the cumulative assessment based upon the Sizewell C application (see REP1-036). The updated information from Sizewell C does not materially alter the conclusions of the Applicants' assessments. There is no evidence of this scale of project (i.e. the Projects) being a deterrent and the Applicants note that none of the Interested Parties have provided evidence of negative impacts of the scale suggested from the EA1 project which affected many of the same receptors (including the Suffolk Coasts and Heaths AONB).
109. As previously discussed, the Applicants consider that other proposed projects (such as the NVG interconnectors or other offshore windfarms) should not be included within the assessment given their stage of developments and the lack of detailed information for them.

3.3 Construction – Local Labour Markets and Local Issues Including Considerations of Other Potential Employment Heavy Construction Projects

110. The Applicants, Suffolk County Council and East Suffolk Council are in agreement on the baseline, methodology and conclusions as evidenced in the **Statement of Common Ground with East Suffolk Council and Suffolk County Council** (REP1-072).

3.3.1 Local Labour Markets

111. Suffolk County Council and East Suffolk Council raised issues about the labour market, cumulatively with Sizewell C which the Applicants have addressed in their **Socio Economics and Tourism Clarification Note** (REP1-036) submitted at Deadline 1, which the Councils acknowledged at Deadline 2 (**Comments on**



Applicants' Additional Information Submitted at Deadline 1 (REP2-029) and **Comments of Suffolk County Council in respect of Socio-economics** (REP2-034)). The Applicants hope to submit an updated Statement of Common Ground with the Councils soon.

112. The Applicants have considered the updated Sizewell C construction numbers and determined that these would not materially change the Applicants' conclusions. These only result in a small (<0.5%) difference in the magnitude of effect on the labour market.

3.3.2 Accommodation

113. Suffolk County Council and East Suffolk Council's concerns regarding accommodation availability during construction cumulatively with Sizewell C have been resolved (**Comments on Applicants' Additional Information Submitted at Deadline 1** (REP2-029) and **Comments of Suffolk County Council in respect of Socio-economics** (REP2-034)).
114. The Applicants have considered the Sizewell C Main Development Site Chapter 9 Socio-Economics and appendices. Although there are changes to the worker numbers presented for Sizewell C in their application documentation compared to those used by the Applicants in their Applications, the Applicants do not consider that these would materially change the conclusions presented in the Applications. There would be excess accommodation demand only in peak season and only in the scenario where the Projects are constructed in parallel and this coincides with the Sizewell C civils peak (being year 7 of Sizewell C construction). This scenario is unlikely given the published construction programmes for the three projects.

3.4 Social Effects Including Access to Services and on the Tranquillity of the Countryside during Construction Phases

115. The social effects of the Projects have been assessed in terms of the different receptor topics of the EIA (i.e. air quality, noise, traffic and transport, public rights of way (PRoW) etc), these are then brought together both **Chapter 27 Human Health** (APP-075) the **Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078). Chapters 27 and Chapter 30 use the conclusions of the receptor specific assessments to understand how these act together on socio-economic receptors. In addition, the socio-economic assessment includes stand-alone issues such as effects on tourist accommodation.
116. The Applicants consider that if the potential impacts on within a topic are minimised or mitigated, there will be no 'knock-on' effects on the community. For example, the Traffic and Transport assessment (**Chapter 26** (APP-074)) assesses impacts such as driver delay and severance. The driver delay



assessment (**section 26.6.1.11**) concludes no adverse effects, therefore there would be no significant upon emergency services or public transport.

117. In terms of direct and indirect impact, Suffolk County Council and East Suffolk Council are content with the baseline and scale of the assessment. Whilst there will be localised impacts, mitigation measures outlined in the assessments and the associated certified plans mitigate those impacts (covering concerns such as air quality, noise, traffic and transport etc). The certified documents and plans will be refined and agreed post consent with Suffolk County Council and East Suffolk Council.
118. One of the provisions of the **Outline Code of Construction Practice** (REP3-022) is for a local community liaison officer as a single point of contact for communications during construction. The Applicants consider that the key to reducing anxieties and concerns is in having robust communications regarding exactly what will happen (where, when and how) during construction. The main responsibilities of the community liaison officer will include:
- Ensuring effective and open communication with local residents and businesses that may be affected by the construction works.
 - Maintaining a proactive public relations campaign, keeping local residents informed of the type and timing of works involved, paying particular attention to activities which may occur in close proximity to receptors.
 - Keeping local residents informed through a combination of communication channels, for example information boards and parish council meetings.
119. The community liaison officer will commence work in advance of construction once details are available on the programme. This process is similar to what was undertaken in respect of East Anglia ONE which worked effectively.

It is worth noting that aside from works at the substations, works along the onshore cable route will be episodic as different operations are undertaken (i.e. site preparation, excavation of trenches, cable installation or cable pulls) (see **Onshore Cable Route Works Programme Clarification Note** (REP3-056)). This means that there would not be continual activity along the length of the onshore cable route for the duration of the construction period. Taking the example of PRow, management measures (as per the **Outline Public Rights of Way Strategy** (REP3-024)) would only be required whilst active construction is being undertaken. **Section 2.2** covers how temporary measures would work in practice, including how timings of measures would be communicated.