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Enquiries to: Graham Gunby
Tel: 01473 264807
Email: graham.gunby@suffolk.gov.uk



Planning Inspectorate (by email)

EastAngliaOneNorth@planninginspectorate.gov.uk

EastAngliaTwo@planninginspectorate.gov.uk

Dear Sir/Madam

**SCOTTISHPOWER RENEWABLES OFFSHORE WINDFARM DCO APPLICATIONS
REP. REF. 20023106 IN RESPECT OF EA1N PINS REF. EN010077
REP. REF. 20023105 IN RESPECT OF EA2 PINS REF. EN010078**

Please find below the Relevant Representations of Suffolk County Council in respect of the East Anglia One North and East Anglia Two offshore wind farm DCO applications.

The County Council recognises the national benefit these projects will bring in meeting the renewable energy targets and creating sustainable economic growth in Suffolk provided this is achieved without significant damage to the local built and natural environment, local communities and tourist economy. The local impacts of the projects and their cumulative impacts should be considered and adequately addressed by the applicant.

The areas where the County Council has significant concerns and they remain unresolved have been outlined below, these matters will be further expanded in the Local Impact Report which will be submitted separately:

- Landscape and Visual Effects – The applicant has not fully understood the character and significance of the features and landscape elements of the site, especially in relation to the historic landscape character and therefore the Environmental Statement does not fully recognise the harm caused by the development. The effectiveness of the proposed mitigation planting has not been adequately justified especially as the assumed growth rates are not reasonably likely to be achieved in the prevailing local conditions. The visualisations are not considered reliable with the inclusion of unsecured preconstruction planting and trees, and vegetation that is seemingly of significantly greater maturity than the 15 years specified. The mitigation planting will therefore be largely ineffective for many more years than is claimed.

The applicant has not demonstrably exhausted all reasonable measures to minimise the impacts of the permanent onshore substations. It is essential that the size and scale of the proposals is minimised with careful consideration given to the layout of the site, building design and materials.

- Noise and Vibration – There are concerns regarding the adequacy of the noise assessment which it is considered underestimates the operational noise impacts at the substation site. The County Council has concerns regarding the modelling of the noise sources, omission of noise from National Grid infrastructure, rating level, assessment of background noise levels, omissions from the assessment and validity of the assessment method utilised. Further information is required before the Council can determine whether the construction noise assessment is a representative assessment of construction noise and vibration.
- Design and Masterplan – There is insufficient commitment within the Outline Design Principles Statement to secure the minimisation of the scale of the buildings, adequately mitigate the noise emitted or address the known future intentions of the site. The County Council is also not content that the draft Development Consent Orders do not apply the Outline Design Principles to the National Grid substation.
- Substation – There are concerns in relation to the onshore substation infrastructure associated with both EA1N and EA2 and the impacts on landscape and visual amenity, heritage assets, noise and public rights of way. When taken together there will be a significant adverse impact in respect of the sensitivity of the receiving landscape, local residents and visitors. The mitigation proposals presented to date do not satisfactorily address these concerns.
- Traffic and Transport - The Council considers that the proposals are inadequate in a number of ways including:
 - the provisions for abnormal loads are insufficient, particularly for the future as AIL access for maintenance and decommissioning are not assessed in either the ES or Transport Assessment (TA) beyond local widening of the B1069/A1094 junction;
 - the proposals to reduce the southbound A12 speed limit to 40 mph at the Friday Street A12/A1094 junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate in the Local Highway Authority's professional opinion to avoid an increase in accidents and that alternative mitigation is required to do so including potentially a roundabout;
 - no provision has been made to enter into a planning obligation with the Local Highway Authority to cover the cost of necessary highways works, for example permanent changes to the A12 speed limit at Benhall;
 - the cumulative impact of this project and other future energy projects has not been assessed in transport terms, this specifically impacts the Stratford St Andrew Air Quality management Area (AQMA);
 - the operational, maintenance and decommissioning activities of EA1(N), EA2 have been scoped out of the ES and TA;
 - that limits of traffic movements have not been included in the outline Construction Transport Management Plan to limit the transport impacts to those assessed in the ES and TA;

- that the delivery of mitigation for these projects do not compromise routes already in use by other schemes e.g. Sizewell C, and;
 - protective provisions, similar to those included in the DCO for other statutory undertakers, are necessary to allow the Local Highway Authority to discharge its responsibilities to access, inspect and maintain the public highway within the order limits.
- Seascape and Visual Effects – The in-combination impacts of the offshore wind turbines of both projects and the visual effects of EA2 alone, will result in significant adverse landscape and visual effects on the Suffolk coast including on the character and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The offshore turbines will have a significant and long-term negative impact on a nationally designated landscape. Given the sensitivity and designation of the receiving landscape and seascape, the applicant has not demonstrably exhausted all reasonable mitigation measures in terms of design of the scheme, including the height of the turbines.

The Council recognises that the principal consultee in respect of the impacts of the development on the AONB and their significance is Natural England. However, the Council is seeking to meet its duties under section 85 of the Countryside and Rights of Way Act 2000.

- Cumulative Impacts –The full cumulative impacts of the existing and potential future projects in the east Suffolk area have not been adequately assessed within the applications.
- Despite the assessments within the Environmental Statement identifying residual impacts from the projects regarding landscape and visual effects, seascape and visual effects, ecology and setting of heritage assets, no additional mitigation and/or compensation is proposed to be secured through a s106. Although funding secured via a s111 agreement is proposed, which the Councils understand cannot be a material planning consideration.

The County Council also has concerns or would wish to make representation in a number of additional areas which have been outlined below:

- Socio-Economic – The County Council also welcomes the creation of a new Memorandum of Understanding which establishes a commitment for the local authorities and SPR to work in partnership to maximise the education, skills and economic benefits of the SPR offshore wind projects. The potential scale of local economic growth however hinges on the choice of both base and marshalling ports, which the applicant has not confirmed. The County Council will work with SPR to demonstrate the economic benefits of using the facilities at Lowestoft. Notwithstanding these positives, the County Council is concerned in relation to the cumulative pressures on the labour force, on the supply chain and on accommodation for workers with other major infrastructure projects, in particular the proposed Sizewell C new nuclear power station. The potential impact on tourism is not adequately addressed within the submissions especially when taking into consideration the visitor survey undertaken by the Destination Management Organisation (2019).

- Heritage - The assessments under predict the level of harm caused by the developments on the settings of some listed buildings and the County Council disagrees on the principle that the mitigation planting will help to reduce the impacts. The projects will also result in the loss of the historic parish boundary between Friston and Knodishall runs directly through the middle of the proposed substation locations which has not been adequately addressed.
- Air Quality – The promotor’s assessment shows a risk of adverse impacts to residential amenity if vehicle emissions do not improve as expected between 2018 and 2023. Should Sizewell C’s DCO application be successful, cumulative construction traffic impacts from EA1N/EA2 and Sizewell C pose a risk to achieving the NO₂ annual mean air quality objective within the Stratford St Andrew AQMA. Additional information to demonstrate that adverse impacts have been completely mitigated and managed is required. A requirement is recommended to ensure an action group review air quality monitoring data and proactively manage construction traffic to minimise exceedance risks.
- Public Rights of Way – The impact of the developments on the amenity and the quality of the user experience of the public rights of way network has not been adequately addressed in the application. This aspect should be a separate theme within the Environmental Statements in order to address the impact on both the tourism industry and the local communities.
- Flood Risk - Although recent flood events in Friston are thought not have had their origin within the proposed substation site the information within the application is not sufficient to determine how the proposed development would interact with existing drainage patterns.
- Ecology – The County Council is concerned that there are some ecological receptors which are either not considered to have been fully assessed or have insufficient mitigation/compensation measures identified within the Environmental Statements and secured within the draft Development Consent Orders (DCO). These include the impact on bats, hedgerows, woodlands and trees during construction and designated sites in relation to adverse impacts on air quality during construction. In addition to these areas the Councils are disappointed with the lack of commitment to biodiversity net gain.
- Coastal Change – Further information is necessary to demonstrate the proposed works do not cause local cliff destabilisation or damage to the subsea crag outcrop and revisions are required to the requirements to ensure that the detailed design of the works is submitted for approval before construction commences.
- Archaeology – The submitted information falls short of the level of detail required by the County Archaeologists. This calls into question the delivery of the schemes within the red line boundary.
 - Land Use – The proposals will result in the loss of an area of the best and most versatile agricultural land.

- Construction Management – There are specific points along the onshore cable corridor where the order limits are constrained, or the construction works will occur very close to residential properties i.e. area south of Sizewell Gap Road, Hundred River Crossing and Friston. Further work is necessary to understand how construction in these areas would be managed to minimise harm.
- Major Accidents and Disaster Assessment - The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 introduced the requirement for Major Accidents and Disasters to be considered as part of the EIA process. The Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005 places a duties on Category 1 responders, including Suffolk County Council, to assess risks of emergencies, both natural and man made, and to maintain emergency plans to mitigate, manage and control the effects of such emergencies to protect the public and the environment. There does not appear to be any reference to statutory civil contingency risk information nor has there been any consultation prior to these DCO applications with the Suffolk Local Resilience Forum to understand detailed local risk information and related emergency planning to allow an assessment of vulnerability to take place. There is reference to Control of Major Accident Hazard Regulations but this is not appropriate in for this development unless the construction site is going to utilise hazardous materials that take operations into lower or upper tier status under these regulations. Accordingly, there is no description of measures to prevent or mitigate the significant adverse effects of such risks on the environment or details of the preparedness for and proposed response to such emergencies. This makes it difficult to understand whether the onshore construction activity has been properly assessed against the pre-existing civil emergency risks or if aspects of the construction activity itself may impact on pre-existing Suffolk emergency response arrangements.
- Development Consent Order – As drafted at present there are a number of areas that need amendment in the light of the above concerns.

The County Council's Summary Position

The County Council:

- a) welcomes in principle the proposals for EA1N and EA2 in respect of their benefits in terms of reducing carbon emissions and help meet the climate change emergency and in bringing high skill jobs and growth to Suffolk, but;
- b) objects to the location of the proposed substation and associated development at Friston due to the scale of the impact on the community and environment;
- c) is of the opinion that the proposals do not adequately address some significant issues, including specifically the significant impact of the offshore turbines on the Suffolk Coast and Heaths AONB and the impact on the highways network, particularly in combination with the proposed SZC development;
- d) will continue to seek and advocate for s106 agreements to secure appropriate mitigation and/or compensation in relation to the identified impacts of the proposals, and;

- e) continue to raise our concerns with government regarding the cumulative impacts resulting from the uncoordinated development of these and other energy projects along the Suffolk coast.

If I can be of any further assistance with any of the above please do not hesitate to contact me.

Yours sincerely,



Graham Gunby
Development Manager
Growth, Highways & Infrastructure