



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 in respect of Socio-economics

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

SoCG with SCC submitted by SPR

ID	Topic	Statement	EA2 Ltd position	EA1N Ltd position	ESC position n/a	SCC position	Notes
LA-16.07	Assessment Conclusions	<p>The conclusions of the cumulative impact assessment with other developments as set out in Table 30.98, Chapter 30 (APP-078) are acceptable for the following aspects of the Projects:</p> <ul style="list-style-type: none"> • Cumulative construction impacts with other developments in relation to Impact 1a Onshore construction employment and Impact 1b – Offshore construction employment; and • Cumulative operation impacts with other developments in relation to Impact 1 – Long terms employment. 	Agreed	Agreed		Not Agreed – under discussion	<p>SCC requests that the applicants commit to updating their CIA to consider the Sizewell C DCO submission material.</p> <p>The applicants have committed to a review of Sizewell C information during the Applications' Examination phase. The Applicants will review what has changed between the submission of the Applications and the publication of Sizewell C DCO application.</p> <p>SCC also requests that the applicants commit to updating their CIA to include East Anglia Three which by virtue of the East Anglia Hub approach is likely to result in the Projects being constructed in a similar timescale or simultaneously.</p>

							<p>The applicants are considering their position on the matter</p> <p>.</p> <p>SCC also requests that the Applicants reconsider the projects included within the CIA to consider potential new projects coming forward and delays to the timelines for existing projects.</p> <p>The applicants consider that the assessment of cumulative impacts of other existing and potential future projects is robust and follows Planning Inspectorate Advice Note 17. See paragraph 13 of this SoCG for further information on SCC's and applicant's position on the CIA.</p> <p>Further Comments</p> <p>The recent Socio-Economics and Tourism Clarification Note (Document Reference: ExA.AS-17.D1.V1) has taken into consideration new SZC information and the worst case modelling of parallel construction of the East Anglian Hub. SPR conclude that having taken into account all available information the</p>
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							<p>Applicants conclusions would not change.</p> <p>SCC agrees with the applicants conclusions and therefore agree this particular SoCG</p>
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5. Comments on responses to the ExAs Written Questions (ExQ1)

ExQs 1	Question to:	Question:	1	2	Applicants Response	SCC Comments
1.17.1	The Applicant	<p>Cumulative Effects ES Chapter 30 [APP-078] identify, in Tables 30.84, which build out scenario for EA1N and EA2 provides the worst-case in relation to onshore construction employment, offshore construction employment, tourism employment and tourism and recreation employment. They conclude, in relation to tourism and socio-economic effects, moderate and major beneficial significance. The Offshore Cumulative Impact Assessment (CIA) [APP-477] includes a number of offshore windfarms that are screened into the assessment as set out in Table 2.1 of Appendix 14.4. An arbitrary 10nm distance to screen projects into the assessment has been used, but this is not explained. Explain your criteria in relation to screening in projects into the assessment and any confirmation of approach through consultation you received.</p>	1	2	<p>Table 30.84 of Chapter 30 Tourism, Recreation and Socio-Economics (APP-078) provides the rationale for the cumulative scenarios for the Projects only (i.e. whether sequential or concurrent build has the greatest effect). In terms of employment we state: <i>“Building both projects concurrently would sustain a larger demand for labour that would put a larger demand on the local and regional labour market.”</i> This is true for onshore and offshore employment and related effects upon the hospitality sector. The criteria for screening other projects into the socio-economic CIA for construction employment was based upon major infrastructure projects in the region that were likely to be constructed in the same timeframe as the Projects. This is the reason that consideration, for example, of the consented Lake Lothing Crossing was excluded as this is expected to complete construction prior to</p>	No issue with applicant’s response.

				<p>the start of the Projects' onshore works¹.</p> <p>The CIA does not include the proposed interconnectors (Nautilus and Eurolink) or other mooted connections at Friston for the reasons stated in Chapter 5 EIA Methodology (APP-053) (paragraph 86). The assessment therefore considers the likely developments with which the Projects' construction would overlap and with which there is potential to draw from the same pool of labour, namely Sizewell C and Norfolk Boreas. The Applicants note that the assessment methodology for this assessment (including the CIA) has been agreed with SCC and ESC within the relevant SoCG as submitted at Deadline 1 (ExA.SoCG-1.D1.V2). The Applicants are unsure as to the reference in the question to Appendix 14.4 (APP-477) as this relates only to the assessment for Shipping and Navigation. The criteria for Shipping and Navigation are unrelated to the socio-economics CIA. In addition for clarity, Appendix 14.4 (APP-477) screens wind farms as far as 90nm from the Projects into the shipping and navigation CIA (Table 1.1).</p>	
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1.17.2	The Applicant	<p>Cumulative Effects</p> <p>Local hotel accommodation is likely to be in demand during the peak summer season and at varying degrees around the year focused on school holidays. SCC raise concerns over cumulative pressures on workforce, supply chain and accommodation for workers, including Sizewell C [RR- 007]. The ExA note the applicant's statement [AS-036] that workers for Sizewell C will choose to stay within the rental market.</p> <p>a) Do you consider enough accommodation would be available locally for any necessary construction workers who may be from outside of the area to stay in, particularly in peak times, and considering both projects and other local schemes such as Sizewell C? Can the Applicant secure any mitigation to promote the use of rental rather than holiday accommodation?</p> <p>b) Provide further evidence on cumulative pressures on the local workforce and supply chain were the schemes and Sizewell C to be consented, such as potential overall numbers of construction required, including potential numbers which may be from out of the local area and thereby require accommodation.</p> <p>In carrying out the CIA what information have the Applicants been provided by Sizewell in relation to accommodation use by their workforce?</p>	1 2	<p>The Applicants have submitted a Socio-Economics and Tourism Clarification Note SZC CIA (ExA.AS-17.D1.V1) at Deadline 1 which deals with the matters raised.</p> <p>In summary, the Applicants have considered the following documents from SZC:</p> <ul style="list-style-type: none"> • •Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP-195) • •Volume 2 Main Development Site Chapter 9 Socio-economics Appendices 9A - 9F (SZC APP-196) • •Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) <p>Although there are changes to the worker numbers presented for SZC in the SZC 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 demand only in peak season and only in the scenario where the Projects are constructed in parallel and this</p>	No issue with applicant's response.
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				<p>coincides with the SZC civils peak. This scenario is unlikely given the published construction programmes for the three projects.</p> <p>The Applicants have concluded this both from a review of the SZC CIA conclusions and by taking the SZC project-alone numbers and re-running the cumulative assessment presented in the Applications. The Applicants continue to discuss tourism matters with SCC/ESC.</p>		
1.17.4	The Applicant	<p>Ports</p> <p>ES Chapter 30 [APP-078] states that if a port in the area were to be used for load out, then the most likely location is Great Yarmouth or Lowestoft, noting that qualification levels in these areas are lower than average and both are relatively deprived socio-economically when compared to national Indices of Multiple Deprivation (IMD) statistics and that either would benefit from investment that could lead to longer term employment. SCC consider that Lowestoft should be used as the base and marshalling port.</p> <p>The ExA note that you state that the Applicant will continue to engage with the local Councils with respect of base and marshalling ports [AS-036]</p> <p>a) Can you confirm which port(s) would be the projects' base, marshalling and load out port(s) at this stage? Has the</p>	1	2	<p>a) No port(s) have been selected at this time. Such facilities would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. The EIA therefore considers the impacts of constructing and operating the onshore infrastructure only.</p> <p>Requirement 36 of the draft DCO (APP-023) requires a Port Travel Plan (PTP) to be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority. SCC have requested that an outline PTP be prepared by the Applicants and this will be submitted at</p>	No issue with applicant's response.

		<p>choice of such base(s) been assessed in terms of traffic and transport?</p> <p>If this is not possible, what measures might be included in the projects to secure economic benefits to ports and address relevant matters including labour force skills and training? How would the final ports be chosen?</p>		<p>Deadline 2 following consultation with SCC on a draft of this plan.</p> <p>b) The Applicant has made a commitment to both ESC and SCC to maximise local skills, training and economic benefits through the signing of a Memorandum of Understanding (MoU). The MoU includes an objective to use best endeavours to use ports in East Suffolk and Great Yarmouth during the construction, operations and maintenance phase, provided there is a commercially acceptable agreement.</p> <p>SPR has strong ties to the local communities throughout East Anglia through various outreach routes, such as working with East Coast College Offshore Wind Skills Centre as the Lead Industry Partner, delivering STEM and inspiration activity to over 3,500 local school children and a partner in the local STEM Hub – ensuring communication between education and industry.</p>	
1.17.5	The Applicant, SCC, ESC	<p>Memorandum of Understanding (MoU)</p> <p>A MoU is discussed to ensure a commitment for local authorities and the applicant to maximise education, skills and economic benefits of the projects. Such a MoU is welcomed by SCC.</p> <p>a) How would such an MoU be enacted, and would it be binding?</p>		<p>a) The MoU is an agreement which has been signed by Suffolk County Council, East Suffolk Council and ScottishPower Renewables (UK) Limited (SPR). During the construction of East Anglia ONE, SPR and SCC collaborated</p>	<p>No issue with applicant's response.</p> <p>However, the MOU only emerged during EA3 examination not for construction of EA1 (although this makes no fundamental difference).</p>

		<p>b) Have means of securing it directly (through for example discharge of a requirement or conclusion of a Planning Obligation under the Town and Country Planning Act 1990) been considered and would they be necessary?</p> <p>Please update the ExA on the progress of the MoU. Have the New Anglia Local Enterprise Partnership been involved?</p>		<p>under an MoU to maximise education, skills and economic benefits. The MoU successfully captured the importance of collaboration between both parties. The MoU has now been updated in respect of the Projects and East Anglia Three and it establishes the commitment for all parties to continue to develop the close working relationship with the intention to work in partnership to maximise the benefits of the SPR East Anglia Offshore Wind Projects. This ensures a collaborative and cohesive approach towards the delivery of the associated skills activity within the communities most closely associated with our projects.</p> <p>A strong working relationship has been established since works commenced on East Anglia ONE and the Applicants will build on this relationship through the delivery of the Projects and East Anglia THREE.</p> <p>b) Securing the commitments made within the MoU through the formal planning process was considered, however based on the outputs to date this was deemed not necessary. The MoU promotes collaborative</p>	
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				<p>working between parties, ensuring that outreach, activity and action all remain relevant in addressing the local needs as they evolve.</p> <p>The flexible nature of the MoU, particularly during COVID, has allowed the Applicants to create new methods of engagement and provide support in order to continue to deliver on the key principles of the MoU. Progress continues to be made on the delivery of the MoU objectives following its update to include East Anglia ONE North and TWO. Regular meetings have been scheduled between SCC, ESC and the Applicants and an agenda has been agreed. In addition to this, as detailed within the MoU, bi annual meetings will take place, with all relevant parties in attendance.</p> <p>The New Anglia Local Enterprise Partnership (NALEP) are a stakeholder of the Applicant and the NALEP's regional strategy is taken into account and discussed alongside the strategy of other stakeholders, during the regular dialog with SCC and ESC.</p>	
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6. Comments on any additional information/submissions received by Deadline 1

The recent Socio-Economics and Tourism Clarification Note (Document Reference: ExA.AS-17.D1.V1) has taken into consideration new SZC information and the worst case modelling of parallel construction of the East Anglian Hub. SPR conclude that having taken into account all available information the Applicants conclusions would not change.

SCC agrees with this and therefore should be able to agree this particular SoCG.

Notwithstanding that SCC continues to disagree with the Applicant on the identification of other developments that should be considered and assessed as part of the CIA, SCC can confirm that if the CIA were to be limited only to the projects currently assessed by the Applicant, it has no issue with the applicant's response.

7. Comments on Post hearing submissions

Not applicable.

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

Not applicable.