



The Planning Act 2008

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

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Issue Specific Hearing 4 (ISH4) into onshore environment, construction, transport and operational effects

Suffolk County Council Summary of Oral Case

Examining Authority's Question	Suffolk County Council's Response	References
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings		
Agenda Item 2 – Energy White Paper: Powering our net zero future		
a. Review of issues arising	<p data-bbox="846 555 1505 587"><u>Energy White paper and offshore transmission</u></p> <p data-bbox="846 628 1339 660"><u>Energy National Policy Statements</u></p> <p data-bbox="846 667 1854 884">1. The White Paper commits (p.55) to updating these during 2021 and a consultation is expected with a view to a revised suite of Energy NPSs to be designated by the end of 2021. However, the White Paper is also clear that until such time as a new NPS is published the existing documents remain in force for the purposes of the PA 2008 and provide a proper basis for decision making.</p> <p data-bbox="846 922 1854 1219">2. SCC reiterated the point (made at ISH2) that the direction of travel in the review could be properly taken into account in determining the weight to be given to the different strands of current policy (with more weight being given to a strand of current policy that marches in the same direction as that direction of travel, e.g. on the design of energy infrastructure being fit for purpose over the lifetime of development, being reinforced by the increased emphasis on opportunities for co-ordination and integration to reduce impacts on local communities).</p> <p data-bbox="846 1257 1854 1331">3. SCC is of the view that the stated commitment to review in the White Paper does not delay the consenting process.</p>	<p data-bbox="1886 555 2056 660">References below this section.</p> <p data-bbox="1930 667 2110 740">1. 2. 3. 4. 5.</p>

Offshore Transmission Infrastructure

4. The Energy White Paper sets out, in summary, the approach of the Government and other relevant bodies, to the coordination and consolidation of offshore transmission infrastructure, on page 80.

“The current regime for connecting offshore wind farms to the onshore grid has encouraged single point-to-point connections. Each project has a separate cable route and associated onshore infrastructure. We recognise the impact this is having on the coastal communities which host this infrastructure and will act quickly to take the necessary steps... We have launched the [OTNR] ... this will consider the full impacts on affected communities, particularly on the east coast of England...

The [OTN] review will seek the appropriate balance between environmental, social and economic costs. It will also consider the potential of hybrid, multi-purpose interconnectors, which are already being explored by developers in the UK and the Netherlands, to get the most from our offshore wind and transmission assets. These hybrid projects could integrate the transmission links we need to connect offshore wind to our grid with interconnectors to neighbouring markets.

Initial outputs from the ESO, delivered as part of the review, have shown that taking a more coordinated approach could deliver up to £6 billion in consumer savings by 2050, significantly reducing environmental and social impacts on coastal communities...

In order to start delivering these benefits, we will encourage projects already in development, where early opportunities for coordination exist, to consider becoming pathfinder projects. This will help inform the design of the enduring regime...”

5. It should also be noted that the Energy White Paper’s key commitments (p.87) include;

‘To minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid.’

		<p>6. This is a clear recognition that the status quo for connections to the National Grid fails to minimise impacts on local communities to best effect, and is sub-optimal in terms of efficiency.</p>	
<p>b. Responses</p>		<p><u>Energy White Paper and OTNR</u></p> <ol style="list-style-type: none"> 1. The work carried out to date on the Offshore Transmission Network Review was set out in greater detail at the BEIS Seminar on 17th December 2020. 2. The presentation slides and a recording of the event can be found at ref 1. 2. and 3. 3. The Phase 1 Final Report on Offshore Coordination published by NG-ESO on 16th December 2020 can be found at; ref 4. and 5. It is this Phase 1 Report which is the source of the £6 billion consumer savings and significantly reduced environmental and social impacts (compared to the status quo) referred to in the Energy WP. 4. It should be noted that the savings/reduced impacts on this scale were those arising in the 'Integrated 2025' scenario assessed in the Phase 1 Report (p.27). The Phase 1 Report explains its different scenarios at p.17. It is clear that the 'Integrated 2025' scenario was predicated on 'how an integrated network could look if integration commences from 2025...' It is therefore implicit that the Energy WP was not expecting the status quo to be maintained for all projects currently at the application or approved stages (otherwise any 'Integration' benefits from 2025 would be illusory, given project lead in times). Whilst p.27 of the Report refers to £5.5 billion capital cost benefits and £1 billion operating cost reductions, it is explained in footnote 4 that 'we have added the capital and operating expenditure 	

together and rounded down to £6 billion in the key messages.’ Hence the Executive Summary (p.04) refers to £6 billion.

5. Footnote 5 (on p.04) is explicit that ‘This means applying an integrated approach to all offshore projects which have not yet received consent.’ Thus, the Phase 1 Report envisaged that the benefits achievable in its ‘Integrated 2025’ scenario would come about by applying that approach to all offshore projects which had not been consented at the time of that Report (December 2020).

6. The Applicants’ contention that there was no expectation in the Energy WP that projects at the application stage should be encouraged to consider coordination/integration because ‘projects already in development’ only applied to pre-application projects is incorrect. The meaning of the phrase is straight-forward and certainly embraces any pre-consent project. Such projects are still ‘in development’ because they have not been sanctioned and are capable of alteration as they progress towards consent. Indeed, even a consented project which has not been implemented could be seen to be still at the ‘in development’ stage but SCC does not need to go this far for its point to succeed.

8. Moreover, the interpretation that any project that has not yet been consented is included within the White Paper’s encouragement to integration is wholly consistent with the Phase 1 Report (in particular Footnote 5), which provided the evidential under-pinning for the White Paper’s approach.

9. The Applicants also contended that the Energy WP encouragement was limited to cases where early opportunities for coordination ‘exist’ and that no such opportunities could ‘exist’ at present because the NG-ESO ‘Early Opportunities’ workstream for the Offshore Coordination project was only at the initial stage of scoping and optioneering (NG-

ESO answer to ExQ2(a) at D4).

10. However, that same statement by NG-ESO also included that, whilst decisions on which projects would be pathfinders would be unlikely to be made before the close of these Examinations, *“Whether pathfinder decisions will relate to these projects is not currently known”* (NG-ESO answer to ExQ2(c) at D4).

11. The reference to ‘these projects’ was (obviously) specifically a reference to EA1N and EA2. NG-ESO was not in any way ruling out that ‘these projects’ could be included as pathfinder projects.

12. In other words, the close of the Examinations is not a bar to either EA1N or EA2 being selected as a pathfinder project. There is no restriction in the Energy WP or in the ONTR on the Applicants putting forward their projects for consideration as pathfinder projects, and if the Applicants expressed a willingness to do so, and showed how their projects could be sensibly coordinated with those of other developers also looking to connect to the NG network in the vicinity of Friston, that is an outcome that would be fully consistent with the ‘encouragement’ in the Energy WP.

13. SCC is therefore disappointed with the Applicants’ approach of refusing to engage with the encouragement to co-ordination and integration in the Energy WP. It would appear that that refusal is based on the mistaken belief that the guidance is not intended to apply to these projects, rather than because there is some practical or technical impediment to considering whether actions could be taken to promote co-ordination and integration with other projects.

14. It is SCC’s view that such opportunities do exist in the design of the substations at Friston. Over and above SCC’s separate concerns about

the adequacy of the CIA of the development proposed at Friston, SCC would invite the Applicants to include in the design principles for the substations the objectives of co-ordination and integration with other projects that may potentially connect to the National Grid network at Friston.

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15. Changes to primary legislation are the stated ambition during 2021 as set out at (slide 41) and at 1hr: 21:30 stated on the video; *“internally we are working to a timetable that would prepare us for primary legislation late in 2021, if there is an opportunity for that”*.

However, the presentation is also clear that the approach can be applied to ‘existing projects’ (slide 38) even if the most mature projects would not be amenable to any, or any significant, consolidation and coordination (slide 39) and that any coordination of mature projects would be developer led. See 1:12:00 to 1:16:00 on the video.

16. Slide 22 discussed the East Coast Grid Spatial Study which was commissioned by The Crown Estate in July 2020 as one of the workstreams within the OTNR. The Study has been undertaken by consultants AECOM. Slide 24 explained why the East of England was chosen as the study area, for reasons including that *‘the connection of offshore wind is expected to grow significantly over the coming years given the excellent wind resource in these areas’* and *‘other infrastructure is seeking to develop in addition in the region (such as electricity interconnectors and nuclear generation), adding to the pressure and disruption for onshore communities and environment.’*

17. Slide 27 explained emerging conclusions from the spatial mapping that formed part of the AECOM Study:

‘Some areas within study area more or less constrained than others, former would benefit from a coordinated approach earlier.

Existing offshore wind projects have a significant spatial influence on future development, having likely taken optimal routeing options.’

18. The Study therefore corroborates the message that there is a need for greater co-ordination between offshore projects, especially in areas of greater environmental constraint. It also makes the obvious point that a ‘first come, first served’ approach on an unco-ordinated basis risks foreclosing options for later projects.

19. Whilst the final AECOM Study has not been published, these early findings in relation to the East Coast Study Area reinforce the case for promoting the encouragement to greater co-ordination in the Energy White Paper wherever it is practicable to do so. SCC remains of the view that this is something that the Applicants could achieve as part of the evolving design of these projects.

20. Therefore, SCC is of the view that the Energy White Paper in respect of coordinated connections is relevant to the proposals before the ExA. It is acknowledged that the timelines for legislative and regulatory change as well as the maturity of the projects, and the new target of 40GW of OWF by 2030, militate against significant or fundamental modifications to these proposals. However, given the consents last for 7 years during which period both regulatory change and technical innovation can be reasonably expected to take place, SCC is keen to explore flexibility in the design and consequent DCO wording which could allow technological advances in this period to be exploited. In particular, SCC sees no reason why the design principles for the substations cannot reflect the aims of the Energy White Paper for greater co-ordination and integration as regards connections and

other projects, and to reflect as far as practical any regulatory changes or technological advances that could be deployed as the design evolves prior to the implementation phase so as to minimise the impacts of the projects.

Energy White Paper references

1. <https://www.gov.uk/government/groups/offshore-transmission-network-review>
2. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/946574/presentation-17-10-20.pdf
3. <https://www.youtube.com/watch?v=fNN-anUX7il>
4. <https://www.nationalgrideso.com/future-energy/projects/offshore-coordination-project>
5. <https://www.nationalgrideso.com/document/183026/download>

Agenda Item 3 – Landfall and Coastal Processes

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| a. The Applicant’s D1 Outline Landfall Construction Method Statement [REP1-153] | | |
| b. Proposed method(s) of installation | | |
| c. Coastal change and the integrity of the cliffs | | |
| d. The potential impact on the Coraline crag outcrop and Leiston-Aldeburgh SSSI | | |
| e. Potential exposure of structures and remediation | | |

Agenda Item 4 – Onshore Construction and Operational effects			
a. Air Quality			
b. Noise			
c. Light			
d. Flood Risk and drainage			Please see SCC Lead Local Flood Authority Deadline 5 submissions for full details
i. Surface water flooding in Friston			Please see SCC Lead Local Flood Authority Deadline 5 submissions for full details
ii. The Applicant's D3 Outline Operational Drainage Management Plan [REP3-046]			Please see SCC Lead Local Flood Authority Deadline 5 submissions for full details
iii. Existing conditions			Please see SCC Lead Local Flood Authority Deadline 5 submissions for full details
iv. Sustainable drainage principles			Please see SCC Lead Local Flood Authority Deadline 5 submissions for full details
v. Surface water drainage			Please see SCC Lead Local Flood Authority Deadline 5 submissions for full details
vi. Foul water drainage			No comments.

Agenda Item 5 – Onshore Traffic and Transport

a. Regional issues and effects including ports and AIL

i) Regional Issues: Cumulative impact of EA1(N) and (EA2)

The projects comprise the following onshore activities:

1. port activities (requirement 36)
2. construction of cable route and sub stations
3. highway improvements
4. operation
5. decommissioning

Of these activities

- 2 is assessed in the DCO and Environmental Statement Chapter 26
- 4 and 6 are scoped out of assessment
- 1 and 5 are to be assessed separately at a later date either through requirement 36 port travel plan or requirement 28 traffic.

Thus, the information in front of the LHA to fully assess the global impact of these projects at this time.

ii) Regional Issues: Cumulative Impacts of EA1(N), EA2 and SZC in combination

In our deadline 4 (para 3.47) SCC has noted that we understand that EDF will be submitting a revised Transport Assessment for Sizewell C and that the Applicant (SPR) state that they will not be undertaking any further review on the combined impacts of their projects and Sizewell C. It may be unaware of the planned revision, but we consider they should reassess their position after reviewing the revised Transport Assessment.

iii) Abnormal Indivisible Loads

(References below this section)

1. & 2.

3.

4. 5. 6. 7.

The LHA concerns about routing of AILs were included in 21.98 to 21.107 of the joint Local Impact report.

The applicant provided a clarification note at deadline 1. However, the LHA still considers that there are risks:

- to the availability of the HR100 route in terms of the condition of structure
- the long term availability of the dockside unloading wharf at Lowestoft
- That the route from Felixstowe has not been used for heavy loads and the structures have not been assessed as suitable, hence the applicant's inclusion of works 37 although the LHA is not aware of issues at that specific bridge.
- Extension of the HR100 route through Leiston to Friston is along roads not used to carry such loads before. These are typically evolved rather than engineered roads and more susceptible to loading particularly on the edges of the carriageway.

The applicant has made reference to Roads Circular No 61/72 Routes for Heavy and Abnormal Roads. The high and heavy routes 'grid route' maps developed in 1972 are intended to simplify problems in hauliers clearing routes for authorisation of the Secretary of State (now Highways England).

Financial arrangements have been agreed for preserving grid routes where improvement schemes interfere with an existing route. The reference by the applicant in para 44 to 'maintain' routes should be clarified as to preserve them as a route and not construed as financial support for maintenance of the highway.

The circular states that grid routes should not be compromised by any highway scheme. The LHA notes that if the route to Friston were incorporated in the heavy load routes this could fetter its ability to undertake such works as improvements for non-motorised users or

traffic calming if this interfered with passage of AILs. Conversely, if any highway to the sub station is not added to the grid routes the LHA is not obliged to protect access for high or heavy loads.

The Applicants note that they have had discussions with Highways England on this matter who advised that they are not minded to include additional grid routes. The LHA has also had discussions with Highway England on this matter and understands that Highways England are undertaking a review of these routes to ensure they are relevant and up to date. At this time there are no plans to add to the routes, but this has not to our knowledge been excluded as an option.

If the Secretary of State is so minded to permit these applications the LHA would request that the applicant support the LHA in developing a suitable route for AILs (not just Special Order Movements) to access the substation site. This will include:

- Working with stakeholders and future applicants to identify the need for an extension to the grid
- Funding to review of structures on the HR100 route, A12 and B1122 / B1069
- Any necessary strengthening works to enable heavy loads to use these routes
- Implementation of permeant works to enable extension of the HR route to the substation entrance either via A1094 (<100T) or B1122/B1069 to the substation site
- seek assistance from the Department of Transport to support such an extension.

Unless consideration is given to future access to the substation site for the whole life of this project including operation and decommissioning and for future development that is looking increasingly likely the LHA fears that the highway network will remain unsuitable for long, wide, high or heavy vehicles.

		<p>The improvements at works 35 (A1094 / B1069 junction) comprise highway widening and vegetation clearance. The former is understood to be a permanent measure within existing highway (plot 149) but the latter is on land for which temporary possession may be taken (DCO Schedule 9 Article 26) and hence is not, nor are new rights acquired (Schedule 7, Article 20). Part of this land (plot 153) may need to be repossessed for each project or AIL movement to allow for oversailing.</p>	<p>8.</p> <p>9.</p>
<p>b. Local issues and effects – construction and operation</p>		<p>i. With regards to the mitigation proposed at A12 / A1094 Friday Street; the County Council maintains the position, as set out in our Relevant Representations and at paragraph 21.12 and 21.26 of our Joint Local Impact Report (REP 1-132) that the proposals submitted in the DCO to reduce the southbound A12 speed limit to 40mph at the junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate in the County Council's professional opinion to avoid an increase in accidents and that alternative mitigation is required. Mitigation as this location has formed an ongoing workstream with the Applicant and a traffic signal scheme has (subject to detailed design) been identified that would address the highway authority's road safety concerns. The County Council are awaiting formal submission of this scheme.</p> <p>ii. With regards to concerns of the project's impacts on Air Quality in paragraph 146 and Table 19.28 of 6.1.19 Chapter 19 Air Quality (APP-067) the applicant identifies that the modelling of the air quality impacts assumes a proportion of EURO VI standard</p>	<p>10.</p>

		<p>vehicles. The Councils have accepted that a sensitivity test undertaken by the applicant demonstrates that at a 70% proportion of EURO VI is a realistic scenario with acceptable impacts, although this is subject to final agreement through the Statement of Common Ground. Paragraph 59 of the revised OCTMP (REP3-032) does not provide an adequate control regime to achieve compliance with these assumed values merely stating EURO VI standards will be adhered to as far as reasonably practicable or where possible. The Council requires effective controls, monitoring and enforcement to ensure compliance and that the impacts do not exceed those within the ES. This was included in our deadline 4 response para 3.23 to the Applicants deadline 3 Transport and Traffic Clarification Note (REP3-055)</p>	11. 12.
c. Cumulative effects		<p>As mentioned in the SCC oral case, a number of locations have been identified within the Deadline 2 'Sizewell Projects Cumulative Impact Assessment' found here: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002972-ExA.AS-6.D2.V1%20EA1N&EA2%20Sizewell%20C%20Cumualtive%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf. Most notably cumulative impacts that are not proposed to be mitigated by either project are identified as the following:</p> <ul style="list-style-type: none"> Moderate Impacts are identified at Yoxford (Link 2) during the Early Years of Sizewell C (i.e. prior to the construction of the Sizewell Link Road). The Projects' impacts here are broadly a 20% to 26% increase in HGVs. It is understood that the Applicants' position that as the Projects' impacts do not trigger an effect at this location (i.e. they are below a 30% increase in HGVs) their demand would not 	13. 14.

proportionately contribute to a significant cumulative impact.

- Major Adverse impacts are identified at Marlesford (Link 3) during both the Early Years and Peak Years of construction. No mitigation is currently proposed at this location as part of the Sizewell C application. The Projects' impacts here are broadly a 19% to 24% increase in HGVs. It is understood that the Applicants' position that as the Projects' impacts are relative to the impacts associated with Sizewell C and that Sizewell C would be required to provide proportionate mitigation at this location that would address the Projects' impacts given their relative size compared to Sizewell C. Sizewell C has not proposed any mitigation at this location to date.

- Major Adverse impacts are identified at Lover's Lane (Link 11) prior to the delivery of the proposed Sizewell C mitigation (i.e. the proposed off-road bridleway, cycleway and footway). The Projects' impacts here are broadly a 68% to 91% increase in HGVs. It is understood that the Applicants' position here is to engage with Sizewell C and coordinate as far as reasonably practicable. The Council is not convinced of how this would mitigate impacts and consideration should be given to whether controls are necessary on this link until the mitigation is delivered.

The Council remain of the opinion that where effects are identified, the Applicants should provide proportionate mitigation. The Council recognises that the mitigation provided should be proportionate to the Applicants' impacts taking due regard to, generally, the greater impacts associated with Sizewell C traffic.

15.

In order to monitor and address cumulative impacts, particularly those associated with transport and air quality, the County Council considers that if either or both EA1(N) and EA2 are constructed concurrently with Sizewell C that a formal engagement of the SPR Transport Coordinator with the Sizewell Transport Review Group will be necessary so that emerging cumulative impacts can be monitored and action taken if necessary.

Highways references

1. DCO

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-000975-3.1%20EA1N%20Draft%20Development%20Consent%20Order.pdf>

2. EA Chp 26

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001378-6.1.26%20EA1N%20Environmental%20Statement%20Chapter%2026%20Traffic%20and%20Transport.pdf>

3.



SCC Highways
Deadline 4.pdf

4.

ESC SCC Joint Local Impact Report

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002772-DL1%20-%20Suffolk%20County%20Council%20-%20LIR.pdf>

5.

SPR Deadline 1: Transport Clarification Note

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002593->

[ExAAS8D1V1EA1NEA2TrafficandTransportDeadline1ClarificationNote 378410 1.pdf](#)

6.

DfT Preferred routes for high and heavy abnormal loads movements

<https://www.gov.uk/government/publications/preferred-routes-for-high-and-heavy-abnormal-load-movements>

7.

DfT Roads Circular 61/72

<https://webarchive.nationalarchives.gov.uk/20100303222626/http://www.dft.gov.uk/pgr/roads/tpm/tal/circulars/ular6172routesforheavyan4064.pdf>

8.

Land Plans

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-000961-2.2%20EA1N%20Land%20Plans.pdf>

9.

Appendix 26.5 A1094 / B1069 Widening for abnormal indivisible load

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001390-6.3.26.5%20EA1N%20ES%20Appendix%2026.5%20A1094-B1069%20Widening%20for%20Abnormal%20Indivisible%20Load.pdf>

10.

ESC and SCC joint LIR

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002772-DL1%20-%20Suffolk%20County%20Council%20-%20LIR.pdf>

11.

ES Chp 19 Air Quality

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001275-6.1.19%20EA1N%20Environmental%20Statement%20Chapter%2019%20Air%20Quality.pdf>

12.

SCC Deadline 4 response



SCC Highways
Deadline 4.pdf

13.
(<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003341-DL3%20-%20SCC%20-%20Highways%20Comments.pdf>)

14.
[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002972-ExA.AS-6.D2.V1%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002972-ExA.AS-6.D2.V1%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf)

15.
[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002972-ExA.AS-6.D2.V1%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002972-ExA.AS-6.D2.V1%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf).

Agenda Item 6 – Public Rights of Way

- a. Construction effects on the PRow network
 - i. Effects on users
 - ii. Effects on the network

i. Effects on the users

SCC accepts the proposals for the temporary stopping up of the PRow as shown in the Plans (REP3-008) and the principles for managing this process in the outline PRow Strategy (REP-024).

SCC is concerned that the construction effects will diminish the amenity value and attractiveness of the PRow network, particularly in those areas where many PRow might be impacted at the same time, and where the impact is for the length of the construction period, namely:-

- South of Sizewell Gap Road and Leiston -popular and well walked area. The lack of information regarding the timing and





duration of closures causes concern that the access could become very confusing to potential users and effectively unusable.

- The access road from B1122 to Grove Road – the public bridleway that links Friston to Coldfair Green will run immediately adjacent to the works corridor for approx. 700m before crossing the site entrance (works 26 and 27). This bridleway is also the Sandlings Walk. The impact will be for several years as this is the construction access to the substation site. SCC seeks amelioration measures to ensure that walkers, cyclists, and horse riders are not deterred from using this route due to the proximity of the works.
- Substation site -network to north of Friston Village – all the PRow to the north of the village are scheduled for temporary closure at some point during construction, and permanent closure for Footpath 6. Users on all part of this network will be subject to the construction impacts including noise, visual intrusion, loss of tranquillity and traffic, as the essentially open rural landscape becomes a major construction site. Although the PRow network will physically remain, albeit with intermittent temporary closures of unknown duration, its amenity value to the users will be lost.
SCC consider this loss of amenity to the local community has not been fully recognised or mitigated.

ii **Effects on the network**

All PRow will have alternative routes provided by SPR before any temporary or permanent closures take place, thereby maintaining the physical connectivity of the network.

	<p>This approach to the management of temporary closures can work reasonably well as shown by the EA1 project.</p>	
<p>b. Effects on the PRow network in the operational period i. Effects on users ii. Effects on the network</p>	<p>i. Effect on the users</p> <p>Substation site</p> <p>Currently, the quality of experience and the good connectivity of the network in the vicinity of the substation site surpasses that of the rest of the village where paths are subject to traffic noise and severance by the A1094, or subject to farming disturbance. The presence of the substations will permanently diminish the character and attractiveness of the PRow network as the essentially rural landscape becomes an industrial site. The proposed diverted route of footpath 6 (E-354/006/0) will replace the physical path within the network, but not the quality of experience for users.</p> <p>SCC consider this long-term loss of amenity to the local community has not been fully recognised or mitigated.</p> <p>The proposed route for the permanent diversion of E-354-006/0 is accepted by SCC, noting that the draft DCO allows for further agreement on this matter.</p> <p>ii. Effect on the network</p> <p>SCC accepts the principles in the Outline PRow strategy for the restoration of PRow affected by the works.</p>	

Agenda Item 7 – Any Other Business Relevant to the Agenda		
<p>The ExAs may raise any other topics bearing on onshore environment, construction, transport and operational effects as is expedient, having regard to the readiness of the persons present to address such matters.</p> <p>The ExAs may extend an opportunity for participants to raise matters relevant to the topic of these hearings that they consider should be examined by the ExAs.</p> <p>If necessary, the Applicants will be provided with a right of reply</p>		<p>Monitoring and controls of management plans. The LHA provided a response at deadline 4 (para 3.17 to 3.20) that included proposals for more effective monitoring and effective controls on HGV movements. The LHA would welcome a formal link between the Transport Co-ordinator (TCO) and the Sizewell C Transport Review Group so that the impacts of construction on the local community and road network can be managed in a co-ordinated manner if the projects are concurrent.</p>
 <p>SCC Highways Deadline 4.pdf</p>		
Agenda Item 8 - Procedural Decisions, Review of Actions and Next Steps		
<p>The ExAs will review whether there is any need for procedural decisions about additional information or any other matter arising from Agenda items 2 to 7.</p>		
<p>To the extent that matters arise that are not addressed in any procedural decisions, the ExAs will address how any actions placed on the Applicants, Interested Parties or Other Persons are to be met and consider the approaches to be taken in further hearings, in the light of issues raised in these hearings. A written action list will be published if required.</p>		
Agenda Item 9 - Close of the hearings		
	