



## 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 11 – 7 June 2021

East Suffolk Council's Responses to the Examining  
Authorities' Third Round of Written Questions

The table below details East Suffolk Council’s (ESC) comments in relation to the third round of written questions issued by the Examining Authorities (ExQ3).

| ExQs 3     | Question to:  | Question asked:   | 1 | 2 | ESC Response   |
|------------|---|---|---|---|--|
| <b>3.0</b> | <b>Overarching, general and cross topic questions</b> |   |   |   |  |
| 3.0.1      | ESC, SCC, SC&H<br>AONB, New Anglia LEP, MMO           | <p><b>Plans and strategies</b></p> <p>Please submit copies of the following documents to the examinations. You are only requested to submit those documents for which you are the owner/author. Full documents in PDF format are requested.</p> <p>a) Suffolk County Council<br/>                     a. Local Transport Plan 2011 – 2031;<br/>                     b. Suffolk Green Access Strategy (Rights of Way Improvement Plan);<br/>                     c. Suffolk Minerals and Waste Local Plan 2020.</p> <p>b) East Suffolk Council<br/>                     a. East Suffolk Strategic Plan 2020 - 2024;<br/>                     b. East Suffolk Economic Growth Plan 2018-2023;<br/>                     c. Suffolk Coastal Local Plan 2020;<br/>                     d. If any policies in the Waveney Local Plan 2019 are considered to be important and relevant then please submit it also;</p> |   |   | <p>The documents requested by the Examining Authorities have been provided within the following appendices submitted with this document.</p> <p>Appendix A - East Suffolk Strategic Plan 2020 - 2024;<br/>                     Appendix B - East Suffolk Economic Growth Plan 2018-2023;<br/>                     Appendix C - Suffolk Coastal Local Plan 2020;<br/>                     Appendix D - Waveney Local Plan 2019;<br/>                     Appendix E - ‘Made’ Leiston Neighbourhood Plan (2017).</p> <p>Progress on other Neighbourhood Plans identified has been outlined below:</p> <p>Aldringham cum Thorpe Neighbourhood Plan</p> <ul style="list-style-type: none"> <li>• Application for the designation of Aldringham cum Thorpe neighbourhood plan area was approved on 5 May 2016.</li> <li>• No draft plan produced yet, but a Neighbourhood Plan steering group has been established.</li> </ul> <p>Saxmundham Neighbourhood Plan</p> <ul style="list-style-type: none"> <li>• Application for the designation of Saxmundham neighbourhood plan area was approved on 29 August 2017.</li> </ul> |

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|       |                     | <p>e. The made Leiston Neighbourhood Plan (2017);</p> <p>f. A description of progress on and latest drafts (if available) of the Aldringham cum Thorpe, Saxmundham, and Kelsale cum Carlton Neighbourhood Plans and any other Neighbourhood Plan(s) considered likely to have important and relevant content.</p> <p>c) Suffolk Coast and Heaths AONB</p> <p>a. Suffolk Coast and Heaths AONB – Natural Beauty and Special Qualities Indicators document;</p> <p>b. Suffolk Coast and Heaths AONB Management Plan 2018-2023;</p> <p>d) New Anglia LEP</p> <p>a. Economic Strategy for Norfolk and Suffolk 2017;</p> <p>b. New Anglia Local Industrial Strategy;</p> <p>e) MMO</p> <p>a. Suffolk Shoreline Management Plan 7, 2012;</p> <p>b. East Inshore and East Offshore Marine Plans.</p> |  | <ul style="list-style-type: none"> <li>• No draft plan produced yet, but Neighbourhood Plan Group has undertaken some initial community engagement and it is anticipated that a draft plan for consultation may be produced within the next six months.</li> </ul> <p>Kelsale cum Carlton Neighbourhood Plan</p> <ul style="list-style-type: none"> <li>• Application for the designation of Kelsale cum Carlton neighbourhood plan area was approved on 2 November 2017.</li> <li>• No draft plan produced.</li> </ul> <p>There are no other parishes with Neighbourhood Plans which will be directly affected by development associated with the projects.</p> |
| 3.0.2 | The Applicants, ESC | <b>Section 111 Agreement</b>  |  | a) Not applicable – this question is directed at the Applicants.   |

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|  |  | <p>The ExAs note that East Suffolk Council states in its response to ExQ2.0.5 [REP6-079] that the s111 Agreements will secure funding in order to provide compensatory measures to help address the residual adverse impacts identified within the ESs, but that the Council itself <i>“notes that the Applicants will not be asking the Examining Authority to attach weight to this compensation in its decision-making”</i>, even though the Council themselves have moved to a predominantly neutral position on the overall balance of adverse impacts against benefits, partly by taking <i>“into account the compensation secured in the agreements”</i>.</p> <p>Compensation sums that are not secured in the dDCO or accompanying certified documents or in another appropriate and enforceable instrument cannot be accorded weight and may not be able to be taken into account by the ExAs when considering their recommendations.</p> <p>To the Applicants:</p> <p>a) Do you agree with the Council’s statement that <i>“the Applicants will not be asking the Examining Authority to attach</i></p> |  | <p>b) ESC has sought to secure compensation through the s111 Agreements in relation to matters where the Environmental Statements identify adverse residual effects, or in relation to matters which ESC considers adverse residual effects will exist, after mitigation. This is in order to secure appropriate compensation for the residual effects caused by the projects in the event that the applications for Development Consent Orders (DCOs) are approved by the Secretary of State. Securing appropriate compensation where mitigation is not available or sufficient to reduce the adverse impacts of the development is in line with the mitigation hierarchy. The s111 Agreements will provide funding to deliver compensatory measures to help offset harm caused by the developments. The Agreements do not, however, replace the need for the projects to deliver primary mitigation to mitigate specific impacts. It is only to address residual effects, after mitigation, that compensatory measures are secured through the Agreements.</p> <p>The s111 Agreements provide sums to fund compensatory measures to address specific impacts and the wording in Schedule 2 of the Agreements has been drafted to reflect this. Suffolk County Council (SCC) were directly and fully involved in negotiations on the s111 Agreements, it was the intention that they would also be a signatory, SCC however withdrew prior to signing. As stated above, ESC considered it essential to seek appropriate compensation for the residual effects in the event the DCOs are consented. In addition to SCC, an Area of Outstanding Natural Beauty (AONB) Partnership officer was also consulted during discussions on</p> |
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|  |  | <p>weight to this compensation [the S111 Agreements] in its decision-making”?</p> <p>To the Council:</p> <p>b) Why has the Council moved to this position when the s111 Agreements do not seek to secure mitigation in relation to specific impacts?</p> <p>c) In circumstances where s111 Agreements do not secure benefits that should (in the Council’s view) be weighed in the Planning Balance, is the Council content with a position in which no weight can be ascribed to any mitigation measure provided by or to any broader community benefit emerging from these agreements?</p> |  | <p>the content of the Agreements. Both SCC’s and the AONB Partnership Officer’s comments were taken fully into consideration and helped to shape the Agreements. The measures identified have therefore been determined in consultation with these stakeholders.</p> <p>ESC requested for the compensatory measures to be secured through s106 agreements rather than s111 Agreements and this was a matter of significant discussion between the parties. This was not however a matter upon which the Applicants and ESC could reach agreement, with the parties having differing views regarding whether the funds met the legal tests. The Applicants choose to proceed with the compensatory measures being secured through s111 Agreements.</p> <p>ESC considers that the s111 Agreements meet the legal tests required for them to be treated as a material consideration. They fairly and reasonably relate to the development permitted and serve a planning purpose in providing for compensatory measures to offset adverse residual impacts caused by the Projects. As the Cabinet Report identifies, the Council took these funds into account during its decision-making in relation to the projects. A table has been provided within Appendix F which identifies the different funds secured by the s111 Agreements, alongside the residual effects identified within the Environmental Statements or by ESC, to which the compensation is directed and the potential compensatory measures to be delivered.</p> |
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|     |                 |  |  | <p>ESC also considers that the funds are necessary to make the development acceptable in planning terms, which is why the preference was to secure the measures through a s106 agreement. The measures identified within the table are all relevant to planning. They seek to offset the residual effects caused by the EA1N and EA2 projects alone and in-combination by providing compensatory measures within the same locality as the identified impacts. The level of funding provided is also considered proportionate to the scale of development proposed.</p> <p>The Council however recognises that the Examining Authority and Secretary of State may take a different view and may decide that the s111 Agreements cannot be treated as a material consideration during decision-making.</p> <p>c) It is not the Council’s view that the compensation secured through the s111 Agreements cannot be weighed in the planning balance. They meet the relevant tests to be treated as material considerations in that they fairly and reasonably relate to the development; serve a planning purpose and there is a real connection between the financial contribution and the proposed development. As stated in response to b), ESC considers that the s111 Agreements secure benefits that should be considered and weighed in the planning balance, however if the Examining Authority does not agree and comes to a different view, then the Council accepts that no weight can be ascribed to the measures provided by the Agreements.</p> |
| 3.1 | <b>Aviation</b> |  |  |   |


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|                      |  | No questions for ESC.   |  |  |
| 3.2                  | <b>Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))</b> |   |  |  |
| Offshore ornithology |  |   |  |  |
|                      |  | No questions for ESC.   |  |  |
| Marine mammals       |  |   |  |  |
|                      |  | No questions for ESC.   |  |  |
| Benthic ecology      |  |   |  |  |
|                      |  | No questions for ESC.   |  |  |
| Fish ecology         |  |   |  |  |
|                      |  | No questions for ESC.   |  |  |
| Terrestrial ecology  |  |   |  |  |
| 3.2.28               | NE, ESC  | <p><b>Ammonia emissions on Leiston-Aldeburgh SSSI and Sandlings SPA</b></p> <p>In the representation from SEAS [REP5-109] and at ISH 14 the issue of the impact of emissions, in particular Ammonia, on Leiston-Aldeburgh SSSI and Sandlings SPA was raised by Mr Redmore. The Applicants responded to this in [REP6-032]. Having regard to these submissions, please comment on whether this matter has been properly assessed by the Applicants and what you consider the impacts on the habitats and species of the aforementioned SSSI and SPA would be as a result of vehicular and machinery emissions associated with the Proposed Developments.</p> |  | <p>The Environmental Statements show that construction traffic on public highways associated with the proposed development would result in a minimal impact at designated habitat sites which can be screened out. Accounting for ammonia emissions could potentially result in slight increases in the forecast impacts at designated habitat sites due to road traffic, but any increase in impacts would be minimal and would, ESC considers, not give rise to any likely significant effects, such as they can continue to be screened out. As highlighted in REP6-032, additional measures to control nitrogen dioxide impacts, in the event of cumulative impacts between Sizewell C's and EA1N &amp; EA2 projects' construction traffic, in the Stratford St Andrew Air Quality Management Area (AQMA) are proposed. This consists of a commitment to 70% Euro VI HGVs and would also have a benefit in further reducing the impact of traffic emissions at designated habitat sites. ESC considers that ammonia from road traffic on public highways would not have a significant adverse effect on Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) or Sandlings Special Protection Area (SPA).</p> |

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|  |  |  |  | <p>In relation to Non-Road Mobile Machinery (NRMM) emissions, the Air Quality Deadline 3 Clarification Note (REP3-061) indicates that the impact on airborne nitrogen oxides (NOx) concentrations would be of greater concern than nitrogen or acid deposition. Consequently, ESC considers that a small increase in impact due to ammonia emissions from NRMM (if any) would not be significant and can be accommodated within wider discussions regarding the impact of NRMM on habitat sites and any control measures provided.</p> <p>However, ESC has raised concerns about the impacts of NOx emissions from NRMM. As set out in the Council’s Deadline 9 Submission - Review of Actions Identified in the Local Impact Report (REP9-041), ESC’s view is as follows:</p> <p><i>“Whilst ESC defers to Natural England on matters relating to air quality impacts on statutory designated sites, ESC remains concerned that landfall construction could result in an adverse impact on part of the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). ESC refers to comments that it provided at Deadline 7 (REP7-063, paragraph 3.9 and 3.13) which provides further detail on this matter. Subject to any further advice from Natural England, ESC considers the detailed design of the projects should commit to all available mitigation measures to minimise this impact and appropriate monitoring should be carried during the construction phase to ensure that the conclusion presented by the Applicants is the outcome that occurs.”</i></p> |
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|            |   |  |  | ESC considers that the Applicants have made sufficient commitments at this stage within the OCoCP (REP10-003) to ensure that appropriate mitigation can be secured should the deployment of NRMM present an issue for nearby habitat sites. Provided NOx emissions from NRMM can be appropriately mitigated and monitored, ESC does not expect any additional impacts to occur due to emissions of ammonia from NRMM.   |
| <b>3.3</b> | <b>Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations</b> |  |  |   |
|            |   | The ExA had no questions in this round.  |  |   |
| <b>3.4</b> | <b>Construction</b>   |  |  |   |
|            |   | The ExA had no questions in this round.  |  |   |
| <b>3.5</b> | <b>Draft Development Consent Orders (dDCOs)</b>   |  |  |   |
|            |   | ExAs' Commentaries on the dDCOs has been published separately.   |  |   |
| <b>3.6</b> | <b>Electricity Connections, Infrastructure and Other Users</b>                              |  |  |   |
|            |   | The ExA had no questions in this round.  |  |   |
| <b>3.7</b> | <b>Flood Risk, Water Quality and Resources</b>  |  |  |   |
|            |   | No questions for ESC.  |  |   |
| <b>3.8</b> | <b>Historic Environment</b>   |  |  |   |
| 3.8.4      | The Applicants, ESC, SCC, HE and any other IPs  | <b>Cumulative Impacts</b><br><br>The ExAs note in the Clarification Note – Archaeology and Cultural Heritage [REP1-021] that the Applicants acknowledge that the public right of way trackway to the north of the Church of St Mary which follows the parish and Hundred Boundary should be considered as a heritage asset in its own right. The trackway/public right |  | <p>a) The trackway contributes positively to the significance of the Church and Little Moor Farm, both as individual assets and as part of the group of heritage assets that make up the historic settlement to the north of Friston.</p> <p>Individually: The trackway is a historic connection route between the Church and the historic common land and dispersed settlement to the north, and it provides important views to the Church which enhance its prominence within the surrounding landscape. It also provides a historic link</p> |

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|      |  | <p>of way links the Church of St Mary, a Grade II* listed building to Little Moor Farm, a Grade II listed building.</p> <p>a) Given the link that the acknowledged (undesigned) heritage asset trackway provides between the Church and Little Moor Farm, does this increase the significance of the two designated heritage assets, either individually or cumulatively (or both)?</p> <p>b) If yes, how would this significance be affected by the proposed projects?</p> |  | <p>between Little Moor Farm (and the settlement on the edges of Friston Moor) and the village core, thereby contributing to the understanding of Little Moor Farm as a greenside farmstead.</p> <p>Cumulatively: The trackway illustrates the historic relationship between the Church and Little Moor Farm (and by extension the dispersed settlement at Friston Moor) and thereby enhances the understanding of their interconnectedness and the understanding of the spread of the historic settlement.</p> <p>b) ESC has maintained that the interruption of the connection between the village core and the heritage assets to the north would be harmful to the significance of the identified assets (including the Church and Little Moor Farm). The historic track contributes positively to the significance of the Church and Little Moor Farm, and its loss is therefore considered to be one element of the negative impact of the proposed projects. ESC remains of the view that there would be an adverse impact of medium magnitude on Little Moor Farm and the Church, giving rise to an effect of moderate significance on Little Moor Farm and an effect of major significance on the Church, due to their respective heritage importance.</p> |
| 3.9  | <b>Land Use</b>                              |   |  |  |
|      |  | The ExA had no questions in this round.   |  |  |
| 3.10 | <b>Landscape and Visual Impact</b>           |   |  |  |
|      |  | No questions for ESC.   |  |  |
| 3.11 | <b>Marine and Coastal Physical Processes</b> |   |  |  |

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| <p>3.11.1</p> | <p>EDF Energy Nuclear Generation Ltd, ESC, MMO</p> | <p><b>Avoidance of the Coralline Crag</b></p> <p>Paragraph 15 of the Landfall hydrogeological Risk Assessment [REP6-021] states that the HDD is expected to be within the Coralline Crag beneath the cliffs, and the strength of the Coralline Crag is expected to prevent any drilling fluid breakout at this point. In [REP8-052] the Applicants state that complete Avoidance of the Coralline Crag has never been proposed. The Applicants go on to state any reference to avoiding direct physical disruption to the outcrop of Coralline Crag refers to the parts of the Crag that are visible at the surface; the HDD bores as proposed pass through the Coralline Crag, but beneath its visible surface before ‘punching out’.</p> <p>a) Please could you confirm that in Referring to the avoidance of direct physical disruption to the outcrop of Coralline Crag it was also your understanding that this meant only those parts visible at the surface and that the HDD bores would in fact pass through the Coralline Crag?</p> |  | <p>The reason for ESC’s requirement for the Applicants to avoid disruption to the Coralline Crag outcrop is to prevent a significant change to the form of the seabed that, ESC considers, would have potential to alter coastal processes to the possible detriment of adjacent coastlines.</p> <p>ESC recognises that the Horizontal Direction Drilling (HDD) process will involve drilling through the Crag formation on part of the length between the Transition Bay and the shoreline breakout point. The Council does not regard this as having the potential to alter coastal processes.</p> <p>In answer to the questions, ESC can confirm that the statement provided within a) is correct and for this reason b) is not applicable.</p> |
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|             |   | b) If this was not your understanding does this cause any concern and what would be the implications?  |  |  |
| <b>3.12</b> | <b>Marine Effects</b>                           |  |  |  |
|             |   | The ExA had no questions in this round.  |  |  |
| <b>3.13</b> | <b>Nuisance and other Public Health Effects</b> |  |  |  |
|             |   | The ExA had no questions in this round.  |  |  |
| <b>3.14</b> | <b>Other Projects and Proposals</b>             |  |  |  |
| 3.14.5      | The Applicants, SCC, ESC and all other IPs      | <p><b>Future uncertainty</b></p> <p>Bearing in mind any implications of the Norfolk Vanguard judgement, how would the parties propose the ExAs advise the Secretary of State in relation to the uncertainty about possible future development at Friston and in the wider area created by the precedent case, in the event that either one or both projects is approved, and by the clear evidence submitted to the examinations that:</p> <p>(a) the potential to extend the proposed National Grid substation has been demonstrated and</p> <p>(b) the proposed Eurolink and Nautilus inter-connectors are exploring a landfall location between Thorpeness and Sizewell and the Possibility of making a National Grid connection in the Leiston</p> |  | <p>ESC has chosen to answer the two questions in a different order as it is considered that the second question b) helps to answer the first question a).</p> <p>b) National Grid Ventures (NGV) have previously confirmed that they have the same connection offer as the EA1N and EA2 projects and if the National Grid substation is construction under current projects, this is where the Nautilus and Eurolink Interconnector projects would also be connected. ESC provided further details in relation to this matter within the Local Impact Report (paragraph 6.49, REP1-132). NGV also seemed to be relatively confident in their connection location at the time of submitting their Relevant Representation and early submissions (RR-057, AS-018). It is noted more recently that NGV has been less committal in their submissions in relation to the point of connection, stating that Friston is one connection option (REP3-012, REP6-111, REP9-062).</p> <p>ESC considers that it is extremely likely that NGV will be seeking future connections and therefore extensions to the National Grid substation proposed under the current EA1N and</p> |

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|  |  | <p>area, via onshore substations located within 5k of a National Grid substation?</p> |  | <p>EA2 applications to accommodate their interconnector projects. The Electricity Act 1989 requires National Grid when formulating connection to be efficient, coordinated and economical whilst also having regard to the environment. It is difficult to believe that National Grid would consider that building an additional substation in the Leiston area to accommodate Nautilus and Eurolink projects only would meet these tests. ESC therefore considers that there is a level of certainty in relation to the point of connection for these projects and NGV has previously identified that the land take required for each connection.</p> <p>The layout plan attached to the Statement of Common Ground (SoCG) between the Applicants and NGV (REP8-113) illustrates where the extensions to the National Grid substation would be located and their overall footprint.</p> <p>The Applicants provided an appraisal (REP8-074) which sought to consider the potential cumulative impacts of the EA1N and EA2 projects with the extension works required to connect the interconnector projects to the National Grid substation. Within this submission the Applicants also agree that there is a level of certainty in relation to the location of the extensions required to the National Grid substation to accommodate the future connections and that the infrastructure is likely to mirror that of the existing design of the substation.</p> <p>ESC considers that the Secretary of State should therefore recognise that although at present the National Grid substation is only being designed to accommodate EA1N and</p> |
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|  |  |  |  | <p>EA2 offshore wind farms, National Grid are considering this site as a strategic point for future connections, therefore this strategic function and the cumulative impacts should be taken into consideration during his decision-making.</p> <p>The Council recognises that there is less certainty in relation to other elements of the projects. ESC has previously acknowledged (REP9-040) that options for a landfall location, underground onshore cable route and converter station for the Nautilus project are currently being assessed by NGV for feasibility and there is no further detailed information on the project available. The Eurolink project is at an earlier stage in its design work. It is therefore recognised that there is insufficient information available in relation to the landfall, cable route or converter station locations or design to enable a cumulative impact assessment to be undertaken on this infrastructure. Whilst ESC makes this comment on a technical planning basis, it is also considered that this is a flaw in the process and that the Council has been advocating for a more coordinated approach to major energy projects for a number of years (see Appendix A of REP3-094). It is recognised that if the grid connection for these projects is at Friston, the converter station site is likely to be within 5km.</p> <p>a) As stated in response to part b), a layout drawing has been attached to the SoCG between the Applicants and NGV (REP8-113) illustrating where the extensions to the National Grid substation would be located and their overall footprint. The Applicants have also provided an appraisal (REP8-074) in relation to the potential cumulative impacts. ESC provided</p> |
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|             |  |   |  | <p>comments in relation to the appraisal at Deadline 10 (REP9-040). ESC considers that the cumulative impacts of the future connections to the National Grid substation should be taken into consideration during decision-making, it is therefore ESC’s view that the Examining Authority should provide this advice to the Secretary of State. It is acknowledged as detailed in response to b), that a full cumulative impact assessment is not possible but consideration of the impact of the elements of the projects about which there is greater certainty should be considered. The approval of the National Grid substation in this location clearly sets a precedent for future connections, this must be considered now, as to leave consideration of the cumulative impacts to a later application/project would be too late.</p> <p>ESC provided comments in relation to the implications of the Vanguard decision at Deadline 6 (REP6-078) which remain relevant. In summary, ESC considers that approval of the substation at Friston for EA1N and EA2 would effectively open the door to future grid connections at Friston for other projects, the cumulative impacts of which should be considered at this stage.</p> |
| <b>3.15</b> | <b>Project Descriptions and Sites Selections</b> |   |  |  |
|             |  | The ExA had no questions in this round. |  |  |
| <b>3.16</b> | <b>Seascape, Landscape and Visual Amenity</b>    |   |  |  |
|             |  | No questions for ESC.                   |  |  |
| <b>3.17</b> | <b>Socio-economic Effects</b>                    |   |  |  |

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| <p>3.17.2</p> | <p>The Applicants, SCC, ESC, Suffolk Coast DMO and any other IPs.</p> | <p><b>Tourism Fund</b></p> <p>The ExAs note that the Applicants have committed to providing £150,000 to be paid to the Suffolk Community Foundation to market the area during the construction period of the projects [REP9-041]. The ExAs note that the Applicants do not consider that the Projects will have significant impacts upon visitor perception during Construction and direct impacts which could affect visitors already present in the area will be mitigated to not significant levels but that despite this they have committed to the Tourism Fund [REP9-009].</p> <p>Compensation sums that are not secured in the dDCO or accompanying certified documents or in another appropriate and enforceable instrument cannot be accorded weight and may not be able to be taken into account by the ExAs when considering their recommendations.</p> <p>Outline your views on the above Statement and proposed fund, including consideration if relevant of how the Fund could assist the area. If the scenario arises that only one project were to be granted</p> |  | <p>ESC welcomes the Applicants’ commitment to provide a Tourism Fund however the Council does not agree that the projects will not have impacts upon visitor perceptions during construction. ESC has provided comments on this matter within the Local Impact Report (REP1-132), during Issue Specific Hearing 5 under Agenda Item 3 (REP5-046) and within the Statement of Common Ground (REP8-114). In order to seek to address the potential decline in visitor activity as a consequence of visitor perceptions during the construction period of the projects and overlapping construction phases with SZC, the Council considers there is a need to develop marketing activity to attract visitors to the locality. The Tourism Fund will secure the funding for this marketing.</p> <p>Although the Council has full confidence that this sum will be provided by the Applicants, ESC does recognise that without the fund being secured through the dDCOs or an alternative enforceable instrument that the Examining Authorities will find it difficult to accord the fund weight within their recommendations. The Fund is not currently secured through an enforceable mechanism and therefore ESC accepts that the Examining Authorities will not accord it any weight.</p> <p>ESC however in its position as a consultee as opposed to the determining authority, has accorded the fund weight when considering the Council’s overall position on the projects. ScottishPower Renewables (SPR) has made a commitment to provide this fund which is to be payable to Suffolk Community Foundation and to be used towards a tourism marketing campaign. The sum will be paid in three instalments of £50,000,</p> |
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|                    |  | <p>consent, would the Tourism Fund agreement remain the same.</p> |  | <p>with the first instalment paid upon commencement of the projects if constructed simultaneously, or upon commencement of the first project if constructed sequentially. The second and third instalments will be paid annually thereafter on the anniversary of the date of commencement. SPR has pledged to provide the full Tourism Fund even if only one project is granted consent.</p> <p>It is intended by SPR that Suffolk Community Forum will administer the fund which will include the creation of a panel of key stakeholders including the Destination Management Organisation (DMO), ESC and potentially other tourism stakeholders, who will decide on how the fund is spent.</p> <p>The sum was derived on the basis of a proposed marketing plan developed by the DMO to support East Suffolk visitor economy during the construction phases of the projects. A summary of this plan has been provided below but the whole document has been provided within Appendix G:</p> <ul style="list-style-type: none"> <li>• Year1 £50k – to fund full refresh of photo/video assets &amp; initiate a small launch campaign to promote local businesses affected</li> <li>• Years2&amp;3 £50k p.a. – to fund full marketing &amp; PR campaigns focusing on the impacted areas and businesses and to minimise the ‘negative perception’ of the development during construction.</li> </ul> |
| <p><b>3.18</b></p> | <p><b>Transportation and Traffic</b></p> |   |  |   |
|                    |  | <p>The ExA had no questions in this round.</p>                    |  |   |
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**List of Appendices:**

Appendix A - East Suffolk Strategic Plan 2020 - 2024;

Appendix B - East Suffolk Economic Growth Plan 2018-2023;

Appendix C - Suffolk Coastal Local Plan 2020;

Appendix D - Waveney Local Plan 2019;

Appendix E - 'Made' Leiston Neighbourhood Plan (2017).

Appendix F – s111 Agreements and Compensatory Measures

Appendix G – Proposed Marketing Plan to Support East Suffolk's Visitor Economy