

Our Ref: SCC/CON/3322/21
Date: 17 September 2021
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Dear Marnie,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the IA Regulations) – Regulations 10 and 11.

Application by North Falls Offshore Wind Ltd (the applicant) for an Order Granting Development Consent for the North Falls Offshore Wind Farm (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the applicant if requested.

Thank you for consulting Suffolk County Council.

Further to my letter of 16 August 2021 I have set out below comments Suffolk County Council would like to make in respect of Highways and Skills which due to illness and annual leave could not be provided by the deadline. I understand that the Planning Inspectorate have already adopted a scoping opinion and some of these comments are based on that adopted opinion. I will also be providing a copy directly to the applicant.

Highways

ID 5.9.1 Paragraph 670 Onshore impacts of traffic and transport associated with offshore construction (and decommissioning) activity.

SCC would agree with the Planning Inspectorate that the impacts of transport may be significant and should be scoped into the assessment. Essex County Council are the Local Highway Authority for the majority of roads that would carry construction traffic and Highways England the authority for the nearby Strategic Road Network (A12). As a neighbouring authority SCCs major concerns are the impacts on the A12 south of Ipswich, specifically the A12/A14 Copdock Interchange and hence on the residents of Suffolk and local businesses together with the cumulative impact of construction with other NSIPs such as EA1(N), EA2 and Sizewell C (if permitted).

As the port hosting construction activities is undecided SCC would support a similar management plan as developed for EA1(N) and EA2 if the assessment shows the need.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-005402-ExA.AS-5.D12.V5%20EA1N%20Outline%20Port%20Construction%20Traffic%20Management%20and%20Travel%20Plan.pdf>

5.9.7 Table 3.30 Abnormal indivisible loads (AIL).

The DfT HR82 preferred heavy load route runs from the M25/A12 junction via the A12 to Bramford substation in Suffolk. While SCC agrees that transport of AILs by marine or rail is preferable to road and compliant with national policy any improvements to HR82 would be welcomed. The authority notes that the width of AILs has been a matter of detail discussion in the SZC examination due to the routing of these on narrow local roads.

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

5.9.9 Mitigation.

SCC would consider that a Construction Traffic Management Plan is likely to be required this project and this would be consistent with other offshore windfarm applications (EA1, EA1(N), EA2, EA3). Most of these projects also prepared a Construction Workers Travel Plan.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-005238-8.11%20EA1N%20Outline%20Travel%20Plan.pdf>

Skills

Section 4.2 – Project Wide Socio-economics

Section 4.2.1 – Existing Environment

Following previous representation made to assist the definition of study areas we are disappointed to see that only Tendring District, as host local authority, is being considered as the study area. To truly assess the economic benefit or adverse impact of the project the population centres and existing offshore clusters where services and labour will be potentially drawn from should be included in the assessment (Ipswich, Lowestoft & Felixstowe).

Section 4.2.2 – Approach to data collection

We are pleased to see reference to using data from regional studies such as The Technical Skills Legacy for Suffolk and Norfolk (Suffolk Growth Programme Board, 2020) however, this data will only be valuable when considered as part of a wider study area as discussed above. Alongside desk based assessment of socio economic impacts we expect to be consulted, and this clearly demonstrated within the ES and its conclusions, on all relevant articulated areas that will be used to form the assessment.

Section 4.2.3 – Potential Impacts

We are pleased to see the potential impacts that will be assessed across all phases of the project and look forward to working in collaboration with the project to maximise these anticipated positive benefits alongside mitigating adverse impact.

Section 4.2.3.4

Socio economics must form part of the cumulative impacts and effects assessment. It is also imperative that the projects included in this cumulative assessment aren't just drawn from planned offshore and energy projects. The cumulative assessment should take into account any and all projects that will require a similar skill set/service. An example of this would be when considering the impact of onshore civils construction, the cumulative impact should take into account any significant road, rail, utilities, projects that will also require a civils workforce at the same time.

Section 4.2.4 – Approach to Assessment

We agree with the applicant that there is not a set of recognised standards for assessment of socio-economic impacts. However, recent NSIP applications have demonstrated robust methodology and these approaches should be considered to support and aid confidence in the qualitative assessment made in this project.

Yours sincerely,



Andy Rutter
Planning Officer
Growth, Highways & Infrastructure