



Suffolk County Council (20041323)

Comments on Responses to the Examining Authority's First Written Questions (ExQ1)

Bramford to Twinstead (EN020002)

Deadline 4

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Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Orders</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ExQ</i>	<i>Examining Authority’s Written Questions</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>LHA</i>	<i>Local Highways Authority</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SuDS</i>	<i>Sustainable Drainage Systems</i>

“The Council” / “SCC” refers to Suffolk County Council; “The Host Authorities” refers to Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council, and Braintree District Council.

Purpose of this Submission

The purpose of this submission is to provide comments to the Applicant’s responses to the Examining Authority’s First Written Questions [REP3-052]. Examination Library references are used throughout to assist readers.

1 Comments on the Applicant's Responses to the Examining Authority's First Written Questions [REP3-052]

Ref	Topic	Reference Number	Applicant's Answer	SCC's Comment
1a	Socio-Economics and Other Community Matters: Employment	MG1.0.57	<p>The Socio Economics and Tourism Report [APP-066] confirms the conclusions of the Scoping Report [APP-156] that there are no likely significant effects from the project during construction or operation in relation to socio economics and tourism.</p> <p>In the Socio Economics and Tourism Report [APP-066] workforce numbers are estimated to be around 350 staff at peak and an average of around 180 workers on site during construction. The majority of employment activities would require trained specialists who are qualified to work on high voltage electricity lines. These are typically sourced from the Applicant's approved contractors who have demonstrated the skills, training, and experience to undertake the works</p>	<p>SCC (Skills) recognises that the Socio Economics and Tourism report [APP-066] estimates that there will be 350 staff at peak and an average of around 180 workers on site during construction. The applicant, from experience, estimates it is likely that a minimum of 10% of this workforce would be sourced from the local labour market.</p> <p>SCC (Skills) does not consider this to be a thorough or evidence-based examination of the possibility of local labour and requests that the applicant does further work to define the skills needed within its workforce and compares this to the skills available within the local labour market providing an evidence-based approach to assessing likelihood of local labour.</p> <p>SCC (Skills) also note that the job roles that the Applicant expects will be taken up by local labour are not skilled and will provide little to no employment legacy to the region. Therefore, it is expected that the Applicant will</p>

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			<p>safely and competently. However, it is likely that 10% of the workforce (up to approximately 35 jobs at peak) could be sourced from the local labour market, (including but not limited to) apprentices, security workers and delivery drivers.</p> <p>Paragraph 4.3.24 of the Socio Economics and Tourism Report [APP-066] states that:</p> <p>‘Given the relatively low numbers of construction workers employed on the project and that the project would require workers to be experienced in working on high voltage electricity lines, there are unlikely to be significant adverse effects on jobs and employment. The above measures could deliver small beneficial effects through the creation of local job and employment opportunities. As these cannot be guaranteed and as they would be low in number, they are unlikely to result in significant effects on job creation and employment during construction’.</p>	<p>seek to provide opportunities to skilled roles for local labour through upskilling local people in time to take up roles on the project and through the provision of apprenticeship opportunities. The commitment for the Applicant to create these positive opportunities should be secured within the DCO as should a minimum percentage of local labour once further assessment has taken place. This will provide confidence in the Applicants commitment to maximising opportunities for the local community.</p>

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			<p>Given the relatively low number of construction workers, as well as the low number of the construction workforce predicted to be sourced from the local labour market and the absence of any likely significance of effect, the Applicant does not consider that it is proportionate nor necessary to secure a minimum percentage of the workforce from the local labour market in the dDCO.</p> <p>Outside of the DCO process, the Applicant requests contractors tendering for the construction of the project to identify how they propose to provide job opportunities for local people. The Applicant also promotes the use of local supply and small/medium enterprises through main works contractors by embedded targets within its framework contracts. The Applicant will continue to work with Councils and business leaders to identify opportunities to invest in employment networks, including looking for opportunities to work with local businesses.</p>	

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1b	Socio-Economics and Other Community Matters: Employment	MG1.0.58	<p>It has been determined that there are no likely significant effects on socio economics associated with the project during construction, and ES Appendix 15.5 Inter Project Cumulative Effects Assessment (CEA) [APP-144] concludes that significant cumulative socio-economic effects are also unlikely. However, the Applicant is committed to continuing discussions with the Councils and other key stakeholders regarding their aspirations in respect of community benefits. These discussions are outside of the DCO process whilst the Applicant awaits the outcome of the Government's consultation on community benefits. However, to confirm the Applicant would work in collaboration with the Councils, suppliers and other parts of industry to leverage the benefits from the project to the local economy. The Applicant is committed to working with Councils, other energy projects and local stakeholders to understand their priorities on skills and employment. This separate process with the Councils has already begun. Due to</p>	<p>SCC (Skills) maintain that until a full workforce profile has been provided, the Applicant cannot assume there will be no likely significant socio-economic effects.</p> <p>There are a significant number of projects within Suffolk and its surrounding counties that require specialised skills like those that will be needed in the construction of this project. SCC (Skills) is seeking to secure benefit for, and investment in, local businesses and skills to maximise positive opportunities that arise from hosting these projects and only through a thorough assessment of this project’s workforce and supply chain needs can these opportunities be defined.</p>

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			the nature of the project, there would not be a permanent operational workforce.	
1c	Air Quality	AQ1.1.18	As stated in paragraph 5.4.5 of the Construction Traffic Management Plan (CTMP) (document 7.6 (B)), the construction routeing would avoid the AQMA in Sudbury (AQ01 in the CEMP Appendix A: CoCP (document 7.5.1 (B))). In addition, paragraph 7.2.5 of the CTMP states that the contractor will implement a monitoring and reporting system to check compliance with the measures set out within the CTMP (document 7.6 (B)). This would include the need for a Global Positioning System (GPS) tracking system to be fitted to Heavy Goods Vehicles (HGV) owned and operated by the contractor to check for compliance with authorised construction routes. The CTMP is secured through Requirement 4 of the dDCO (document 3.1 (C)).	SCC (Public Health) would query the Applicant whether pollution monitoring will be used on the construction routes.
1d	Historic Environment	HE1.8.6	The Applicant refers to Section 11.9 of the Applicant's Comments on Essex County Council and Braintree District Council LIR (document 8.5.3.2).	SCC (Archaeology) refer to comments in SCC D4 Response to Comments on the Joint LIR.

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			The Applicant refers to Reference 8.48 to 8.52 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council LIR (document 8.5.3.1).	
1e	Historic Environment	HE1.8.7	The programme of inked logical trial trenching is expected for completion in late October 2023. The results of the trenching will feed into an updated Outline Written Scheme of Investigation (OWSI) submitted at an appropriate deadline. The mitigation proposals will take the form of strip map and sample (SMS or open area excavation (OAE) in the areas of cable undergrounding. Where trial trenching has not located any potential for archaeological remains, these areas will not be subject to archaeological mitigation proposals. Therefore, the Applicant can confirm that archaeological mitigation would be confined to one of the mitigation types already identified within the OWSI [AS-001].	<p>SCC (Archaeology) notes that the trenched archaeological evaluation is still ongoing and there are areas where trenching has not been undertaken, in Area G2 due to ecological constraints in Suffolk.</p> <p>Any decisions on the appropriate level of archaeological mitigation will need to be agreed by the relevant local authority archaeological advisors. To date, SCCAS have not approved the OWSI, and have only been sent copies of summary reports of trenched archaeological evaluation stages 1 – 4, stage 5 fieldwork is currently ongoing. The summary reports do not contain scientific analysis or specialist assessment of finds that evaluation reporting would contain. Based on the results of the summary reporting, SCCAS are in a position to discuss mitigation with the applicant, however, the level of archaeological mitigation may change depending on the results of the trenching as they are made available.</p> <p>SCCAS would strongly advise that trenching results for the undergrounding section of the scheme are combined</p>

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				<p>with the results of the geophysical survey to aid in the formulation of mitigation strategies to be presented within the OWSI.</p> <p>SCCAS are concerned that there is no provision for further evaluation particularly within the over-head sections of the scheme relating to work required on the pylon sites and haul roads. As pylon locations are not yet determined, post-determination trenched archaeological evaluation within the overhead sections would accurately quantify the archaeological resource, both in quantity and extent and allow for decisions on the location/micro-setting of the pylon within the LoD as well as the need for, and scope of any further work based on the results of the evaluation. Post-determination archaeological evaluation would also be used to catch any areas that were not possible to trench up-front due to health and safety and ecological constraints, as well as serve as a contingency for areas where upfront archaeological evaluation is shown to be lacking, to aid in the formulation of mitigation strategies.</p>