



Your Ref: EN010025

Date: 30th July 2013

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Dear Ms Chapman

East Anglia ONE Offshore Windfarm

Please find attached to this letter:

- the Local Impact Report of Suffolk County Council, Mid Suffolk District Council and Suffolk Coastal District Council.
- the joint response of the same local authorities to the Examining Authority's first written questions

Yours sincerely

[Redacted signature]

Lucy Robinson
Deputy Chief Executive
& Director Economy Skills and Environment
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**Suffolk County Council
Babergh and Mid Suffolk District Councils
Suffolk Coastal District Council**

Local Impact Report

East Anglia ONE Offshore Windfarm

1. Terms of Reference

Introduction

- 1.1. This report comprises the Local Impact Report (LIR) of Suffolk County Council (SCC), Suffolk Coastal District Council (SCDC) and Mid Suffolk District Council (MSDC).
- 1.2. The Local Authorities have had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), DCLG's *Guidance for the examination of applications for development consent* and the Planning Inspectorate's Advice Note One, *Local Impact Reports*, in preparing this LIR.

Scope

- 1.3. The LIR only relates to onshore impacts of the proposed development as it affects the administrative areas of SCDC, MSDC and SCC.
- 1.4. Specifically, it describes the impact of Works 3B to 41 (as described in the Development Consent Order (DCO)), namely;
- up to 4 onshore HVDC export cables from Bawdsey to Bramford
 - up to 8 additional cable ducts from Bawdsey to Bramford
 - associated cable jointing bays
 - converter station at Bramford
 - temporary construction consolidation sites A to I as set out in Figure 2.1 of the Post Submission Report 1 and Supplementary Environmental Information (SEI).
 - other associated temporary works, including for access
- 1.5. The LIR does not describe the proposed development any further, relying on the applicant's description as set out in Volume 1, Chapter 4 of the Environmental Statement (ES) (document 7.2.4).
- 1.6. Only a brief description of the development area is provided to highlight particular features. The applicant's ES otherwise provides a sufficient description.
- 1.7. There is no relevant planning history to be described, with the Order Limits encompassing largely greenfield land or watercourses, other than where it encompasses the public highway.

Purpose and structure of the LIR

- 1.8. The LIR's primary purpose is therefore to identify the policies in Local Plans in so far as they are relevant to the proposed development and the extent to which the development accords with these policies. It does this under topic-based headings (following the form of the Overarching National Policy Statement (NPS) for Energy (EN-1)) reflecting the likely nature of impacts. The key issues for the local authorities and the local community are then identified, followed by commentary on the extent to which the applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.
- 1.9. While a number of the points made in the LIR are repeated from the local authorities' respective Section 56 consultation responses and SCC's response to the SEI, the importance afforded to the LIR in the Planning Act is such that they are confirmed here so that the Examining Authority and the Secretary of State are in no doubt of the local authorities' views. The LIR has sought not to duplicate material covered in the Statements of Common Ground (SoCG), so redirects the reader to those as necessary. The LIR addresses some of the Examining Authority's first written questions, but where it does so that is made clear in the local authorities' separate response to those questions.

2. Description of the area

- 2.1. The onshore cable passes through approximately 37km of countryside on its route from Bawdsey in Suffolk Coastal District to Bramford in Mid Suffolk District.
- 2.2. The cable lands within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) at Bawdsey, one of the fastest eroding stretches of the Suffolk Coastline, which itself is one of the fastest eroding coastlines in the country. The cable then passes under the unconsolidated cliffs which are also a designated SSSI for their geological interest.
- 2.3. The cable passes under the Deben Estuary Special Protection Area and Ramsar Site in crossing the Deben itself and at Martlesham Creek.
- 2.4. Approximately one third of this route is through the Suffolk Coast and Heaths AONB and a further fifth through Special Landscape Areas between Kirton and Newbourne, and Martlesham to Tuddenham in Suffolk Coastal District and also through the Gipping Valley Special Landscape Area in Mid Suffolk.
- 2.5. The cable route passes through a range of landscapes that broadly comprise the following; from the landfall at Bawdsey the cable route crosses the flat landscape of coastal levels, on both sides of the Deben, made up of largely grassland and arable fields bounded by dykes. The route then strikes north along the western slopes of the Deben valley. This landscape is characterised by large arable fields of light soil, bounded by sparse hedges and scattered with plantation woodland.
- 2.6. North of Martlesham Creek the route turns west along the Fynn Valley and up onto the higher land north of Westerfield. This area is a rolling arable landscape, dissected by several small streams, with Ancient Woodland, small parklands plantations and grassland. Although some hedges have been lost from this area, much of the network of ancient and species rich hedgerows remain.
- 2.7. As the cable route crosses into Mid Suffolk the landscape changes. The countryside is more open with very large arable fields and extensive post war hedgerow loss. However, as the route goes down into the Gipping Valley, the landscape changes again with plantations and belts of designed estate landscapes appearing. After crossing the Gipping Valley the route climbs onto the bolder clay plateau, which in this area is scattered with Ancient Woodland and large, but well hedged, arable fields.
- 2.8. The cable route passes to the south and west of Sutton Hoo, an Anglo-Saxon site of national importance, though through a number of other areas of high archaeological significance, notably the northern side of the Felixstowe peninsula and the valley of the River Gipping. It also traverses the hinterland of Ipswich, one of the earliest and most important towns in the country in terms of archaeological significance.
- 2.9. The connection terminates on land adjacent to National Grid's substation at Bramford, where the existing overhead power infrastructure is a visually

dominant detractor in this landscape as transmission lines and towers converge on the substation. However, the blocks of woodland partially mitigate the impacts of the existing sub-station structures.

- 2.10. The cable corridor thus traverses a largely rural area, characterised by scattered settlements and a generally low population density. Access to this rural hinterland is largely restricted to lower order roads, a number of which do not regularly accommodate large numbers of Heavy Goods Vehicles.
- 2.11. The land affected is mostly in agricultural use, a key sector for the local economy. Also of importance is tourism, largely associated with the natural and historic beauty of the area, and an emerging energy sector. The area is however characterised by household earnings lower than the regional average and a lower proportion of workers with high level qualifications than the national average.
- 2.12. In summary, the development affects a largely rural area characterised by a natural, heritage and historic environment of international recognition. The local economy is dominated by small and medium enterprise business, with a large proportion of employment derived from agriculture and tourism. The economy is however evolving to respond to opportunities, particularly in the energy sector.

3. Statutory Development Plan

- 3.1. The Planning and Compulsory Purchase Act 2004 section 38 (3)(b) (as amended) describes the development plan as the development plan documents which have been adopted or approved in relation to that area.
- 3.2. The Regional Strategy for the East of England Plan was revoked on the 3rd January 2013¹. At the same time, any remaining saved Structure Plan policies were also revoked².
- 3.3. Paragraph 31 of the Applicant's Planning Statement (Document Reference 9.2) states "*there is no county level planning policy that requires consideration for the proposed development*". However it should be noted that SCC is the statutory minerals and waste planning authority and that its policies, as set out in the Minerals and Waste Development Framework, should be considered part of the development plan.
- 3.4. The relevant documents that comprise the development plan are identified below. Other policy documents which might be considered as material considerations are also identified.

Mid Suffolk District Council Local Plan

- 3.5. The Local Plan comprises the ***Mid Suffolk Core Strategy Development Plan Document*** (2008); ***Mid Suffolk Core Strategy Focussed Review*** (2013); ***Stowmarket Area Action Plan*** (2013) and the saved policies of ***the Mid Suffolk Local Plan*** 1998³.
- 3.6. Paragraphs 214-215 of the National Planning Policy Framework ("the Framework") state that once 12 months has elapsed from its publication (on 27th March 2012), due weight should be afforded to existing policies in local plans according to their consistency with the Framework. Paragraph 3 confirms that the Framework can be a material consideration in the consenting of Nationally Significant Infrastructure Projects.
- 3.7. MSDC has also adopted as non-statutory Supplementary Planning Guidance the ***Section 106 Developers Guide to Infrastructure Contributions in Suffolk*** (2013)⁴ ("the Developers Guide"), which sets out the Suffolk local authorities' approach to securing planning obligations from new development.
- 3.8. Of the adopted development plan documents, the Stowmarket Area Action Plan is not relevant to the proposed development. With the exception of the Developers Guide, the adopted Supplementary Planning Guidance is also not relevant to the proposed development.

Suffolk Coastal District Council Local Plan

- 3.9. The current development plan comprises the saved policies of the ***Suffolk Coastal Local Plan*** (1994) incorporating first (2001) and second (2006)

¹ <http://www.legislation.gov.uk/uksi/2012/3046/introduction/made>

² Note that the applicant's Planning Statement (Document Reference 9.2, section 2.3.2) identifies the Regional Strategy as still being part of the Development Plan as it was published in November 2012.

³ <http://www.midsuffolk.gov.uk/planning-and-building/planning-policy/>

⁴ <http://www.midsuffolk.gov.uk/planning-and-building/planning/developers-guide-to-infrastructure-contributions/>

alterations⁵ and the **Suffolk Coastal District Local Plan** (formerly the Local Development Framework) 2013.

- 3.10. SCDC approved its **Core Strategy and Development Management Policies Development Plan Document** on 5 July 2013⁶ and hence these policies now have significant weight. That the Core Strategy has been adopted by the Council during the examination of the application does not raise any new policy issues. The saved policies of the previous Local Plan are largely site specific and not relevant to this development proposal. As a recently adopted Local Plan, the development management policies have been drafted in line with recent guidance, thus do not go in to the level of detail of those within Mid Suffolk's Local Plan and are designed to be read alongside the Framework.

- 3.11. There is no Supplementary Planning Guidance relevant to this project.

Suffolk County Council Minerals and Waste Development Framework

- 3.12. The Minerals and Waste Development Framework comprises the **Minerals Core Strategy Development Plan Document** (adopted 2008); the **Minerals Site Specific Site Allocations Development Plan Document** (adopted 2009) and the **Waste Core Strategy Development Plan Document** (adopted 2011)⁷. It does not however include any specific policies that would be relevant to this development.

Other relevant local policy

- 3.13. As decreed by the Highways Act 1980, SCC is the highway authority for Suffolk. It has therefore, in accordance with the respective legislation, namely the Transport Act 2000 and the Countryside and Rights of Way Act 2000, adopted its **Local Transport Plan 2011-2031**⁸ and **Rights of Way Improvement Plan 2006-2016**⁹. These constitute statements of SCC policy on these matters.
- 3.14. SCC has also adopted the aforementioned **Section 106 Developers Guide to Infrastructure Contributions in Suffolk (2013)** as council policy.
- 3.15. SCC has produced, in association with the Suffolk local planning authorities, and adopted **Air Quality Management and New Development (2011)**¹⁰ as council policy. The District Councils also use this document as informal planning guidance.
- 3.16. SCC is a Lead Local Flood Authority as defined in the Flood and Water Management Act 2010 and is therefore responsible for dealing with flooding from surface water, groundwater and ordinary watercourses¹¹ and for co-ordinating a partnership approach to flood management in Suffolk. The Act requires SCC to develop, maintain, apply and monitor a

⁵ <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/policy/localplan/>

⁶ <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/corestrategy/>

⁷ <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/minerals-and-waste-development-framework/>

⁸ <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/transport-planning/local-transport-plan/>

⁹ <http://publicrightsofway.onesuffolk.net/home/rights-of-way-improvement-plan/>

¹⁰ <http://www.suffolk.gov.uk/business/planning-and-design-advice/supplementary-guidance-air-quality-management-and-new-development-2011/>

¹¹ I.e. not main rivers, for which the Environment Agency has responsibility

strategy for local flood risk management in its area. The statutory **Suffolk Flood Risk Management Strategy**¹² was published in February 2013. This strategy has been adopted by the district councils.

- 3.17. **The Suffolk Shoreline Management Plan** (SMP) 7¹³ was published in 2012. The preparation of an SMP is the duty of the operating authorities responsible for managing the coastline. SCDC adopted the SMP in November 2011, which has also been endorsed by SCC.
- 3.18. **The Suffolk Growth Strategy** (2013)¹⁴ has been endorsed by all Suffolk's local authorities. It sets out a joint ambition for green economic growth and to create more, higher value, better-paying jobs, and more wealth. It identifies nine economic sectors that will drive the growth of the Suffolk economy including energy, ports and logistics, food, drink & agriculture and tourism. It recognises the potential opportunities that will arise in the offshore industry, making specific reference to the East Anglia Array, though does identify skills and qualifications as a barrier to growth.
- 3.19. New Anglia Local Enterprise Partnership (NALEP) which covers Norfolk and Suffolk has identified energy, tourism and the green economy among its priorities and is currently consulting on the **New Anglia Plan for Growth**¹⁵. It identifies the Great Yarmouth and Lowestoft Enterprise Zone¹⁶ (which also has CORE status¹⁷) as being the heart of the East of England Energy Coast and key to the future prosperity of the LEP area. It, like the Suffolk Growth Strategy, identifies addressing skills needs and shortages as a key priority.
- 3.20. **The Suffolk Coast and Heaths Area of Outstanding Natural Beauty Management Plan**¹⁸ has recently been produced in accordance with the Countryside and Rights of Way Act 2000. It seeks to conserve and enhance the special landscape (and seascape) characteristics of the AONB and ensure that they are taken in to account and enhanced by the planning process, with impacts of major infrastructure development avoided, mitigated or offset. It promotes, and recognises the importance of, sustainable recreation and tourism within the AONB and seeks to enhance the understanding of its historic and cultural assets. The Suffolk Heritage Coast is largely contained within the AONB and there are no statutory requirements or powers associated with the Heritage Coast definition.

Summary

- 3.21. With the revocation of the Regional Strategy, the statutory development plan for the area constitutes the Suffolk Coastal District Local Plan, Mid Suffolk District Local Plan and Suffolk County Council's Minerals and Waste Development Framework. Given the age of policies

¹² <http://www.greensuffolk.org/assets/Greenest-County/Coastal/General-Information/Flood-Risk-Management-Strategy.pdf>

¹³ <http://www.suffolksmp2.org.uk/index.php>

¹⁴ <http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Business/Business%20Services/Economic%20development/2013-05-08%20updated%20growth%20strategy.pdf>

¹⁵ <http://www.newanglia.co.uk/About-Us/Plan-for-Growth>

¹⁶ <http://www.newanglia.co.uk/Activities/Enterprise-Zone>

¹⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/31738/11-1395-energy-for-new-anglia-core.pdf

¹⁸ <http://www.suffolkcoastandheaths.org/about-us/aonb-management-plan/>

in the Mid Suffolk Local Plan, decision-takers are required to have due regard to its consistency with the Framework.

- 3.22. There are a number of additional documents produced and endorsed by the relevant authorities which represent local policy on particular topics and which the local authorities consider of relevance to this development.

ASSESSMENT OF IMPACTS AND ADEQUACY OF RESPONSE

4. INTRODUCTION

- 4.1. The following sections identify the relevant policies within the development plan and other local policy, the key issues raised by the proposed development and the extent to which the applicant addresses them and thus the proposal complies with local policy.
- 4.2. As mentioned, for ease of reference, the headings broadly reflect those used in Part 5 of the Overarching NPS for Energy (EN-1).

5. THE PRINCIPLE OF THE DEVELOPMENT

Mid Suffolk policies¹⁹

- 5.1. E10 recognises that industrial development is only acceptable in the countryside in exceptional cases and sets out various matters to be considered. CS2 lists employment-generating development and renewable energy projects among those as being potentially acceptable in the countryside.

Suffolk Coastal policies²⁰

- 5.2. SP12 supports development that contributes towards the mitigation of climate change and encourages, *inter alia*, renewable energy schemes “where consistent with the need to safeguard residential amenity, the environment and the landscape”.

Other local policy

- 5.3. The Suffolk Growth Strategy and emerging New Anglia Plan for Growth in particular provide support for offshore wind development based on the likely local economic benefits.

Commentary

- 5.4. The development plans, without containing detailed policies specific to the principle of the scheme currently being proposed (either the cabling, additional ducts or converter station), allow for such development in certain circumstances, provided particular criteria are met.
- 5.5. With specific reference to the additional ducting included within the East Anglia ONE application for the East Anglia THREE and FOUR projects, the local authorities consider the approach proposed by the applicant to be justified, in planning policy terms, because it would reduce the cumulative duration and scale of impacts across the three projects, thereby deriving the significant local environmental and amenity benefits, as set out in paragraph 5.12 of the applicant’s Explanatory Memorandum (document 4.2).

¹⁹ Policies commencing ‘CS’ denote reference to the Mid Suffolk Core Strategy DPD (2012). Policies beginning with any other letters denote reference to the Local Plan (1998)

²⁰ All policy references refer to the Suffolk Coastal Core Strategy and Development Management Policies DPD (2013)

- 5.6. The local authorities are also aware of the support for such an approach from parish councils, for example Little Bealings, Great Bealings and Grundisburgh & Culpho Parish Councils as noted in their responses to the consultation under Section 56.
- 5.7. While the performance of the development against the specific local plan criteria is discussed in detail below, the local authorities consider that the principle of the development is in accordance with the development plan and for that reason the local authorities support it. Broader support for the development can also be found in the relevant growth strategies for this area.

Adequacy of the application/DCO

- 5.8. DCLG's *Guidance on associated development applications for major infrastructure projects* notes that one of the core principles that the Secretary of State will take in to account in determining whether something is in fact associated development will be whether it supports "the construction or operation of the principal development, or help address its impacts". If inclusion of the ducts for EA THREE and FOUR is justified on the basis of the latter, which the Explanatory Memorandum implies is the case, then the local authorities would seek assurances that the benefits of including the future ducting to lessen the impacts of the overall development in the East Anglia zone are secured.
- 5.9. The DCO does not contain any stipulations in this regard, so it would be open to the applicant **not** to construct the ducts for EA THREE and FOUR in tandem with EA ONE, but at any other time, which could result in three separate phases of trenching, one for each windfarm.
- 5.10. The ES and SEI have assessed a worst case construction period for onshore works of 44 weeks²¹. The DCO does not currently tie the implementation of the project to the parameters of the assessment in this regard and we suggest that either it should do, or else, through some other provision, ensure that the ducts for EA THREE and FOUR must be installed in tandem with the cabling for EA ONE to prevent the installation of ducting for EA THREE and FOUR at some indeterminate point in the future. This would greatly enhance the likelihood of the identified benefits of 'future proofing' being realised. This is a key issue for the local authorities and the local community.
- 5.11. The DCO is otherwise adequate with respect to the description of the development which it proposes to authorise.

6. AIR QUALITY AND EMISSIONS

Mid Suffolk policies

- 6.1. H16 concerns the protection of existing amenity generally, while CS4 refers to avoiding negative impacts on air quality specifically.

Suffolk Coastal policies

²¹ See ES Volume 1 Chapter 4 (document 7.2.4), paragraph 322, and paragraph 74 of the SEI.

6.2. DM23 refers to the need to avoid adverse impacts on residential amenity arising from reduced air quality and light pollution.

Other relevant local policy

6.3. Box 1 in the *Air Quality Management and New Development* guidance sets out the circumstances in which an Air Quality Assessment may be required; this includes applications where significant numbers of HGVs movements may be generated over an extended period of time.

Key local issues

6.4. The principal impacts on air quality are those associated with the construction phase and specifically dispersion of materials from the works areas into neighbouring communities and those associated with the emissions from construction vehicles, particularly HGVs.

6.5. In the case of windblown dust, this has been raised as a matter of concern to local communities, while SCC highlighted the potential impact on the Norwich Road/Valley Road junction Air Quality Management Area (AQMA) in Ipswich through which HGV construction traffic will be routed.

Adequacy of application/DCO

6.6. The SEI addressed SCC's concerns regarding potential impacts of construction traffic on the AQMA. There are not anticipated to be any significant localised impacts on air quality associated with HGV movements. The relevant local guidance has thus been complied with.

6.7. Requirement 27 of the DCO provides for the production of a Code of Construction Practice (CoCP). The applicant has produced an outline CoCP and this is appended to the SoCG between the local authorities and the applicant.

6.8. Section 7.1 therein confirms that an Air Quality Management Plan (AQMP) will be produced in accordance with best practice thus delivering the commitment in Volume 3, Chapter 21 of the ES for such a document. The outline CoCP confirms measures to minimise dust generating activities will be implemented. While this is an acceptable approach to the local authorities in principle, the applicant should consider whether a requirement specific to the production of the AQMP should be included in the DCO.

6.9. Consequently, the local authorities do not envisage any impacts on air quality that cannot be adequately controlled, and thus this is an issue of minimal concern. The development complies with local policy.

7. BIODIVERSITY AND GEOLOGICAL CONSERVATION

Mid Suffolk policies

7.1. CS5 requires all development to maintain and enhance the environment, and specifically to protect and enhance biodiversity through recognition of designated sites, biodiversity action plan species and habitats and wildlife corridors and ecological networks. CL5 outlines that development which would result in loss or damage of woodland, in particular commercial or

ancient woodland, shall be refused, while CL8 similarly advocates refusal for development that is likely to result in loss of, or significant alteration to, important habitats or result in threats to rare or vulnerable species. CL9 sets out protection for nationally and locally designated sites.

Suffolk Coastal policies

- 7.2.DM27 requires protection and enhancement of habitats and their biodiversity value. Adverse impacts on protected/priority species will not be permitted unless adequate mitigation and/or compensation is provided. There is particular emphasis on minimising habitat fragmentation and maximising opportunities for habitat connectivity.

Other relevant local policy

- 7.3. The Suffolk Coast and Heaths AONB Management Plan sets out the intention to conserve and enhance the landscape including biodiversity, noting the particular importance of habitat connectivity in responding to climate change.

Key local issues

- 7.4. Minimising the ecological impacts of the development is a major concern locally and securing adequate mitigation for this purpose has been the subject of rigorous scrutiny by the local authorities.
- 7.5. The local authorities had been concerned that the level of residual impacts anticipated by the submitted application were unacceptable, particularly those associated with hedgerow removal in the cable corridor and the potential impacts on bats using the hibernacula at Little Blakenham Pit SSSI in the locality of the converter station. At the Section 56 stage the local authorities also highlighted that there was limited attention being given to opportunities for ecological enhancement.
- 7.6. Furthermore, in parallel with, though led by, Natural England, the local authorities were concerned over the potential impacts on wintering Brent Geese in the Deben Estuary SPA during construction and specifically the sufficiency of the mitigation proposed and whether it was informed by adequate baseline information.

Adequacy of application/DCO

- 7.7. The local authorities support the approach to cable routeing undertaken by the applicant in that, in particular, it has sought to avoid locally and nationally designated sites and woodland wherever possible and to narrow the working width at hedgerow crossings. Additionally HDD techniques are proposed at a number of environmentally sensitive locations, including river crossings (for example the River Gipping) and under woodland (for example Millers Wood) to further reduce the ecological impacts. The HDD proposals here therefore score positively against policy CL5 in the Mid Suffolk Local Plan.
- 7.8. The local authorities also consider that the routeing in the Bealings area is appropriate and that an alternative route either to the north or south is likely to have more significant environmental impacts in particular through either the loss of woodland (to the north) or through additional

watercourse crossings (to the south). This would not accord with local policy. Consequently, the local authorities concur with the conclusions of the applicant's report *Routing Alternatives Study – west of Woodbridge* (Consultation Report (document 6.1), Appendix 39).

- 7.9. The local authorities have however been working with the applicant post-submission to identify additional mitigation to further reduce the potential impact of the development on hedgerows and bats in particular.
- 7.10. The applicant has now produced an Outline Landscape and Ecological Management Plan (LEcMP) (appended to our SoCG). Paragraph 13 of this document commits the applicant to additional mitigation above that identified in the submitted application.
- 7.11. Specifically, 'special engineering techniques', namely micro-routeing of cables to exploit existing gaps in hedgerows and avoid veteran trees, will now be used to cross all hedgerows where the ES (Volume 3, Chapter 29, paragraphs 263-269 and 286) identified significant residual visual impacts and where any Barbastelle bat passes were recorded (where minimisation of disturbance and maintenance of habitat connectivity is particularly important).
- 7.12. Accordingly, Appendix 2 to the LEcMP now presents an updated schedule of important hedgerows that will (or may be) affected and the associated approach to crossing them. The local authorities now consider that the proposals embedded within the LEcMP to mitigate further the impacts on hedgerows are acceptable.
- 7.13. The LEcMP (paragraph 118) also commits the applicant to undertake further bat surveys to establish commuting corridors in the vicinity of Little Blakenham Pit SSSI and therefore identify the need for additional mitigation, specifically lighting restrictions. It is stated this would be agreed with the local authorities.
- 7.14. While this approach is acceptable, the applicant could alternatively amend Requirement 28 'External lighting and control of artificial light emissions' to specifically relate to the need for it to be informed by additional bat surveys, or more generally amend the Requirement so that the lighting strategy is informed by the ES's assessment of ecological effects and subsequent studies..
- 7.15. With respect to Brent Geese, the LEcMP is supplemented by an Ecological Mitigation Plan for SPA and Schedule 1 Birds. This now outlines contingency measures concerning screening and severe weather restrictions, which, in combination with the other mitigation proposed, should, subject to Natural England's confirmation, avoid a likely significant effect on this species and thus an adverse effect on the Deben Estuary Special Protection Area (SPA).
- 7.16. Finally, in accordance with local planning policy, the local authorities had requested the applicant look further at enhancement measures to compensate for the residual impacts that had been identified in the ES. We are satisfied that significant progress has been made to much reduce the level of impacts originally envisaged in the ES and that consequently the necessity for offsite measures in the cable corridor has diminished.

- 7.17. In the case of the converter station, it has been agreed with the applicant through the production of the supplementary document 'Onshore Converter Station – Principles of Good Design' (appended to our SoCG) that biodiversity enhancements will be considered as part of the building design and layout (including proposals for Sustainable Drainage) at the Converter Station. A Section 106/111 document, currently in draft form, would provide funding to deliver offsite landscaping which would deliver ecological enhancements in addition to mitigating residual visual impacts.
- 7.18. The local authorities are content that the ecological impacts of the development can be controlled to an acceptable level through the provisions set out in the LEcMP (and ancillary EcMP for the Deben Estuary SPA (once agreed with Natural England)) and consequently the proposal complies with local planning policy in this regard.
- 7.19. The LEcMP is designed to form a part of the CoCP. We consider that to add clarity to the DCO, Requirement 27 should be altered to specifically reference the LEcMP, which is referred to under the modified Requirements 19 and 26 (see draft DCO July 2013), but is not specifically provided for therein. We support the addition of this document (and indeed others) to the list of plans referenced under Section 33 of the draft DCO July 2013 (*Certification of plans etc*).

8. COASTAL CHANGE

Mid Suffolk policies

8.1. N/A

Suffolk Coastal policies

8.2. SP30 relates to the Coastal Zone and seeks an integrated approach to considering development on the coast having regard to the adopted Strategic Flood Risk Assessment, the Shoreline Management Plan and any Estuarine Plans endorsed by the District Council.

Other relevant local policy

8.3. Policy Development Zone 6 of the Shoreline Management Plan 7, Orford Ness to Cobbold's Point, identifies a policy of No Active Intervention for the Bawdsey Cliffs at the point of landfall.

Key local issues

- 8.4. The main, and substantive, concern of the local authorities was the potential for the development to interfere with coastal processes in the locality of the landfall point and the consequential implications for cliff stability should erosion rates be affected. Specifically there was concern that the export cables would need protecting in the future - with associated implications for scour.
- 8.5. Similarly, there was concern over whether the process of undertaking the HDD had direct implications for cliff stability, being as they are of an unconsolidated nature.

- 8.6. Particular concerns have been voiced in respect of the short HDD in terms of any trenching into the London Clay wave cut platform and works that require the traversing of the cliffs to get to the beach.
- 8.7. Bawdsey Parish Council raised similar points in their Section 56 response.

Adequacy of application/DCO

- 8.8. The applicant has undertaken a further evaluation of the implications of the development at landfall in a report entitled *Assessment of Coastal Changes at the East Anglia One Cable Landfall* (2013) by ABPmer which the local authorities welcome.
- 8.9. Following discussions with the applicant, proposed changes have been identified as being necessary to both the DCO and Deemed Marine Licence to satisfy the local authorities' concerns.
- 8.10. Specifically an additional Requirement (18A as set out in the Draft DCO July 2013) will necessitate the submission of a detailed method statement for the landfall works to the local planning authority and will also include measures to minimise impacts on cliff stability and coastal processes. This is to be complemented by new condition 9(i) (*ibid*) within the Deemed Marine Licence which will require the applicant to produce a monitoring and remediation plan.
- 8.11. Subject to these changes therefore, the proposals adequately respond to the local policy context.

9. FLOOD RISK

Mid Suffolk policies

- 9.1. CS4 offers support to development that avoids areas of future and present flood risk, promoting location of development in Flood Zone 1. Proposals situated in Flood Zones 2 or 3 must undergo the relevant flood risk tests. The supporting text notes the importance of SuDs to minimising flood risk.

Suffolk Coastal policies

- 9.2. Development is not permitted in Flood Zones 2 and 3 by policy DM28 unless the relevant tests in the Technical Guidance to the Framework have been complied with. This includes the sequential test, exception test (as necessary) and site specific flood risk assessment.

Other relevant local policy

- 9.3. The Suffolk Flood Risk Management Strategy sets out guiding principles on tackling flooding and, for the first time, integrates the issue of flooding from surface water runoff and from ordinary watercourses. One of the key objectives is to prevent an increase in flooding as a result of new development by ensuring SuDs are properly considered and incorporated in to works. The document notes the importance of aligning with the content of Shoreline Management Plans and River Basin Management

Plans to ensure a holistic approach is taken to flood and coastal management and water quality.

Key local issues

- 9.3.1. The local authorities have not identified flood risk as a significant concern, though have noted that a robust Sustainable Drainage strategy will be required for the converter station site to ensure that the existing greenfield run-off rate is maintained and the impacts in the locality from pluvial (surface water) flooding are controlled.

Adequacy of application/DCO

- 9.3.2. The applicant has, through the production of a Flood Risk Assessment (FRA) for both the cable corridor and converter station (ES Volume 3, Chapter 2, Appendices 22.1 and 22.2 (document 7.4.3b)), satisfied the policy requirements of the Local Plans.
- 9.3.3. In terms of flood risk within the cable corridor, the ES (Volume 3 Chapter 22, paragraph 78) sets out that where the cable corridor crosses flood defences, the cable would be laid under those defences using a HDD technique. While the cable corridor passes through Flood Zone 3 in some areas, the mitigation measures outlined in Section 11 of the draft CoCP are adequate.
- 9.3.4. The FRA for the converter station does however set out the intention to discharge surface water runoff to groundwater (ES Volume 3, Chapter 22, Appendix 22.2, Section 5.11). However, no infiltration tests have been undertaken and based on the local authorities' understanding of the soil type in this area (Hanslope), the soil here will have poor infiltration properties and thus discharge is rather likely to be through retention on site and discharge to watercourse (Flowton Brook).
- 9.3.5. The applicant has shared with the local authorities an outline plan showing possible land take requirements of a SuDs solution, which appears to illustrate this is achievable within the Order Limits (though this would have implicit assumptions on infiltration rates). Please see comments under Section 14 Water quality and resources relating to the implications of discharge to water course for compliance with the Water Framework Directive.
- 9.3.6. Requirement 23 provides for a surface water drainage plan to be submitted to the local planning authority and the applicant has, through the production of the *Outline Converter Station Design Principles* (appended to the SoCG), acknowledged the importance of SuDs in finalising the layout and design for these works. These mechanisms should adequately control flood risk and thus the development complies with local policy in this respect.

10. HISTORIC ENVIRONMENT

Mid Suffolk policies

- 10.1. HB1 gives protection to the character and setting of listed buildings. HB14 concerns development that could adversely affect an

archaeological site or its setting. The policy allows for development where satisfactory measures to preserve or excavate and record the archaeological remains are secured. HB15 sets out support for applications which seek to promote archaeological finds as an educational resource.

Suffolk Coastal policies

- 10.2. DM21 requires that the design of any development should have regard to the need to protect existing features that have a heritage value and that where possible such features should be enhanced.

Key local issues

- 10.3. The main issues relate to the possible destruction of archaeological assets within the cable corridor and at the site of the converter station and the impact of the converter station on the setting of listed buildings.
- 10.4. In the case of the latter, the majority of the buildings concerned are farmhouses or former farmhouses and the local authorities can confirm that, having reviewed the location of the listed buildings within the vicinity of the development and evaluated the contribution that their setting makes to the significance of the asset, conclude that the impact of the converter station on these buildings would be less than significant in all cases. The development therefore accords with HB1 of the Mid Suffolk Local Plan.
- 10.5. The archaeological evaluation at the converter station site for the area proposed to be within the footprint of the buildings is complete. The local authorities accept the findings of this work and conclude there are no issues of concern outstanding in this regard, thus the impacts of the converter station on archaeological assets is not an issue.
- 10.6. The remaining concern therefore relates to the installation of the cabling/ducting which will cause extensive ground disturbance to an archaeologically resource rich area which to date has not been subject to systematic archaeological evaluation. Consequently, the overriding issue for the local authorities throughout the pre-application process has been the potential for the destruction of significant heritage assets, particularly those that are hitherto unidentified, but, given the high potential for archaeological assets in the development area, are very likely to be encountered.

Adequacy of application/DCO

- 10.7. The impact on onshore archaeological heritage assets is controlled by DCO Requirement 25 and the Onshore Written Statement of Investigation (WSI), which the former provides for.
- 10.8. While the local authorities have no objection to the wording of the Requirement, the WSI submitted with the application was inadequate as it provided insufficient safeguards to the unknown heritage assets, and thus created the potential for very significant and, in the local authorities' view, unacceptable impacts locally.
- 10.9. Appended to our SoCG is an updated WSI, which the local authorities agree now provides adequate mitigation. Specifically, it provides for a

systematic approach to trial trenching that is not only informed by a geophysical assessment of the entire route and the findings of other previous stages of non-intrusive assessments, but also commits to intrusive testing of 'blank' areas to verify the authenticity of non-intrusively interpreted areas (see paragraphs 52-57 in the WSI).

- 10.10. An important additional form of mitigation is that offered by the width of the cable corridor. Should assets be encountered that need to be preserved *in situ*, there should be sufficient latitude for cables to be routed around that asset, or alternatively HDD/trenchless techniques could also be used (see paragraphs 64-68 in the WSI).
- 10.11. The WSI also sets out the intention to promote, and encourage community engagement in, the project (paragraph 41) and to publicise the findings of the archaeological work in formats suitable for non-expert parties (paragraphs 202-204).
- 10.12. Consequently, with the changes made to the WSI, the local authorities consider the development is now compliant with policies HB14 and HB15 of the Mid Suffolk Local Plan and DM21 of the Suffolk Coastal Local Plan, with the likely impacts able to be controlled to an acceptable level.

11. LANDSCAPE AND VISUAL

Mid Suffolk policies

- 11.1. CL2 outlines that Special Landscape Areas must be safeguarded and that development occurring in these areas must be appropriately designed in relation to materials, layout and landscaping. CL3 requires utilities and power lines exceeding 33KV to be located in areas that minimize intrusion on the landscape. The policy also notes that the feasibility of undergrounding will be a material consideration. CL5 provides protection for existing woodland. E12 requires the protection of existing landscape features and submission of landscaping schemes for new industrial development in the countryside. Policy E8 notes that extensions to existing industrial premises in the countryside should not adversely affect the landscape. CS5 notes the intention to protect and conserve the landscape as a whole and ensure new development is informed by landscape character. CS6 confirms that new development will be expected to provide or support the delivery of green infrastructure including that which provides environmental improvements.

Suffolk Coastal policies

- 11.2. SP15 contains a commitment to protect and enhance the various landscape character areas within the District. These include not only the statutory designations such as the Suffolk Coast and Heaths AONB but also refer to the Special Landscape Areas covered by Policy AP13 of the saved policies from the earlier Local Plan relating to a number of river valleys and tributaries including the Deben and Fynn valleys which are affected by the cable route.

Other relevant local policy

- 11.3. The Suffolk Coast and Heaths AONB Management Plan draws attention to the special landscape characteristics of the AONB and that they should be protected and enhanced.
- 11.4. The Developers Guide identifies that contributions might be required for hard or soft landscaping including for maintenance.

Key local issues

- 11.5. The principal issues of concern relate to the residual impacts associated with the loss of hedgerows in the cable corridor and the associated constraints on replanting (and consequential impacts for landscape character), the appearance and scale of kiosks used where cables are being jointed, and the appearance and scale of the converter station at Bramford.
- 11.6. The issue of hedgerow loss from an ecological perspective is discussed in Section 7 above. The ES (Volume 3, Chapter 29 paragraphs 263-269 and 286) concluded that there would be significant residual visual impacts resulting from hedgerow crossings in a number of locations because these hedgerows were characterised by substantial trees within them that would be removed and not replaced. In particular, the local authorities were concerned about the impacts within the AONB and Special Landscape Areas, notably between Kirton and Woodbridge, to the north of Ipswich at Great Bealings, in the Fynn Valley and Grundisburgh Road and furthermore at Pound Lane, Bramford.
- 11.7. A further issue related to the visual impacts within the cable corridor has been the lack of detail concerning kiosks/jointing pits/jointing bays as they are variously termed within the ES.
- 11.8. In terms of the permanent development, the overriding issue is the converter station at Bramford; in particular whether all reasonable endeavours had been made to minimise the scale, both through the parameters of the building itself and through its siting, specifically whether it could be lowered in to the ground, and furthermore whether adequate provisions were being made to secure offsite mitigation, given the significant visual envelope of the building. These matters have been a key concern of Burstall Parish Council (in Babergh District) and local residents in this area. The substation would not be widely visible from the majority of residences in Bramford Parish due to local topography.
- 11.9. The local authorities have not identified landscape and visual impacts associated with temporary development to be of significant concern.

Adequacy of application

- 11.10. The local authorities accept that the undergrounding of the cabling in its entirety provides significant mitigation against visual and landscape impacts, thus meeting the particular test of policy CL3 of the Mid Suffolk Local Plan. Furthermore, as explained above, the LEcMP now sets out how special engineering measures will be used to avoid significant residual visual impacts at all those hedgerows where the local authorities raised concerns. Furthermore it also sets out in principle how removed hedgerows will be effectively restored and replanted. We do not therefore

expect residual impacts on the character of the landscape in the cable corridor either.

- 11.11. With respect to the kiosks, while the local authorities have been presented with further information concerning the scale and appearance of this infrastructure (*Technical Briefing Note No.1 – Cable Jointing and Joint Pits*), we welcome the proposed modification to the DCO (see Requirement 18, draft DCO July 2013) which constrains the footprint of each kiosk to 1m in width, 0.75m in length and 1m in height and requires the local planning authority to authorise approval for these structures.
- 11.12. The submitted application did not adequately justify the proposals for the converter station, or identify mitigation commensurate with its impact. Subsequently, however, the applicant has provided further justification for the parameters of the converter station (*Technical Note on Building Height and Formation Levels*) explaining the drivers for the scale of the building and inability to be more precise at this point due to the innovative nature of the building – it is stated “a 1,200MW HVDC converter station of this type has not previously been built”.
- 11.13. Furthermore, it is clarified that lowering of the building would require significant earthworks and a need for more substantive concrete structures upon which to construct the building. This in turn would have associated transport implications, with the delivery and possible removal of materials. Additionally, there are concerns over increasing the potential for flood risk through disruption to site drainage. The local authorities accept that there could be disbenefits to altering ground levels.
- 11.14. With respect to the design of the converter station, the local authorities have now agreed with the applicant a set of principles that will be applied to ensure that landscape and visual impacts are further reduced. These are annexed to the SoCG. Principles 2, 4, 5 and 8 are relevant in this context. This is discussed further in Section 18 below.
- 11.15. Finally, the principle of a Section 106/Section 111 agreement between Babergh and Mid Suffolk District Councils and the applicant for a sum of approximately £112,000 has been agreed to address residual visual impacts through new hedgerow and tree planting within a 3km radius of the converter station (work number 39).
- 11.16. This planting will help reinforce the character of the landscape and be used to address visual impacts from key views as identified through the ES and, in future, through feedback from the local community. This is a positive provision that will lead to some localised environmental enhancements which would also benefit the existing, and extensive, development at Bramford substation. The local authorities believe that without this agreement the residual impacts of the converter station would be unacceptable and consequently consider that it meets the tests for development consent obligations set out in paragraph 4.1.8 of NPS EN-1 and is supported by Mid Suffolk policy CS6 and the Developers Guide.
- 11.17. In summary, the DCO, namely requirements 19 and 20, in combination with the LEcMP, Outline Converter Station Design Principles and Section 106/111 are seen by the local authorities as being sufficient to control the

landscape and visual impacts to a level which would provide compliance with the relevant local policies.

- 11.18. Please note, however, the comment at paragraph 7.19 concerning the provisions for the LECMP in the DCO. We comment on Requirement 18 in Section 18 below.

12. LANDUSE INCLUDING OPEN SPACE & GREEN INFRASTRUCTURE

Mid Suffolk policies

- 12.1. CL11 encourages the conservation of agricultural land, with particular importance placed on Grades 1, 2 and 3a. CL12 states regard will be had to the impacts of development on agricultural land on the severance and fragmentation of existing farms. E10 states that applications for commercial and new industrial development in the countryside will be refused unless an overriding need to be located away from towns and villages can be presented. It notes the materiality of a loss of high quality agricultural land. RT12 requires the local planning authority to safeguard footpath and bridleway networks.

Suffolk Coastal policies

- 12.2. SP12 encourages renewable energy schemes. SP1 & SP1A set out the principles of sustainable development that the Council will seek to have incorporated into new development and contains a presumption in favour of sustainable development which accords with the policies of the Local Plan or, if the Local Plan is silent, with the Framework.

Other relevant local policy

- 12.3. Both the Suffolk Growth Strategy and New Anglia Plan for Growth identify the importance of the agricultural sector to the economy of the region.
- 12.4. SCC's Rights of Way Improvement Plan details how SCC will protect and enhance the Public Rights of Way network to improve access to the countryside. It notes the importance of continuity in routes and safety for users.

Key local issues

- 12.5. The main issues relate to the loss of agricultural land and disruption to agricultural activities and interference with public rights of way. Whether the development is an appropriate use of land has been covered under Section 5, Principle of the development.
- 12.6. The majority of the cable corridor passes through Grade 3/4 agricultural land though elements of Grade 2 land, including in the vicinity of the converter station, are affected.
- 12.7. Locally, concerns have been expressed over the implications for agricultural operations (such as subsoiling) once the cable has been installed, i.e. whether it would be buried deep enough, and also whether the width of the cable corridor could be justified.

- 12.8. The impact on the Public Rights of Way network has been a major concern of interested parties, for example Martlesham and Bawdsey Parish Councils.
- 12.9. While promoted footpaths, such as the Fynn Valley Walk, Stour & Orwell Walk, Gipping Valley River Path and Martlesham Circular Walk have a particular status and are a key element of Suffolk's tourism offer, the entirety of the public rights of way network performs an important function at a local level, so the local authorities are keen to see disruption to the network as a whole minimised.

Adequacy of application/DCO

- 12.10. The ES states that within the permanent 55m [sic] easement "agricultural operations would be able to continue as normal" (Volume 3, Chapter 23, paragraph 84). The local authorities would however urge the applicant to ensure this is the case through liaison with individual farmers. If the land became sterilised, this could have consequential impacts for the character of the landscape, should land use change be enforced.
- 12.11. As noted above, it has been clarified that the footprint of any kiosks would be less than 1m² and would occur at intervals of approximately 400-800m and would be located close to field boundaries to facilitate access and to limit impacts on agricultural operations (see Design & Access Statement (document 9.3)) paragraphs 10-11).
- 12.12. In terms of the width of the easement, for the reasons outlined above (Section 5), the local authorities support the installation of ducts for EA THREE and FOUR concurrently with EA ONE. We also consider that the additional width provides the opportunity to mitigate the environmental impacts of the cable/duct installation by providing some leeway to circumnavigate any important archaeological assets that may be identified during construction (see Section 10) and furthermore to facilitate the options available to make use of existing gaps in hedgerows for the purpose of micro-routing (see Sections 7 and 11).
- 12.13. The local authorities consider that the choice of location for the converter station is appropriate as it is outside any designated sites and the surrounding woodland provides a degree of screening, justifying the use of Grade 2 agricultural land. It is also sited within a reasonably self-contained parcel of agricultural land, thus should not cause a particular issue of farm fragmentation.
- 12.14. Furthermore, Section 8 of the Outline CoCP sets out how the construction methods to be deployed to ensure drainage patterns are interrupted as little as possible and that, where possible, trenches will be backfilled with onsite arisings, with material returned in the order they were extracted. Consequently, to the best of the local authorities' understanding, impacts on agricultural activities should be minimised.
- 12.15. Overall therefore, the local authorities do not maintain concerns over the impacts on agricultural land. The local authorities are thus content with the extent of the works proposed and confirm that Requirement 34, which provides for the restoration of land temporarily used for construction, in combination with Requirements 19 and 20 should ensure

that the land is reinstated to its previous use, albeit with certain planting restrictions directly above the cable corridor.

- 12.16. The CoCP sets out the approach to the management of impacts on the Public Rights of Way network. Implementation of the provisions of Section 5 within that document would, in the view of the local authorities, minimise the impact to an acceptable level, given the commitment to limit the extent of closures, provide and advertise diversions and to ensure footpaths are reinstated to an appropriate condition post construction.
- 12.17. In terms of the DCO, we support the updates in the draft DCO July 2013 to Schedule C to include reference to footpaths by path and parish (as is the convention) as the previous referencing reflected the SCC's cataloguing system and is not recognisable to other parties.
- 12.18. In the particular case of Bridleway 2 on Figure 23.3 (Map 1 of 13) (within Volume 3, Chapter 3 of the ES and identified as 'footpath' 6479 in Part 2 of Schedule C of the submitted DCO), we welcome the reduction in the Order Limits (see draft DCO July 2013) to exclude the temporary works area to the north of this bridleway, thus enabling the use of the bridleway during the construction phase. The closure of this bridleway was a particular concern of Bawdsey Parish Council, therefore the applicant's proposals are welcomed.
- 12.19. Overall, therefore, the development complies with the relevant local plan policies. Impacts on other land use are considered under Section 14, Socio-economics, below.

13. NOISE AND VIBRATION

Mid Suffolk policies

- 13.1. H16 establishes the importance of protecting the existing amenity and character of residential areas, based on this a change to non-residential use will be refused where such change could cause nuisance.

Suffolk Coastal policies

- 13.2. DM23 sets out that the Council will have regard to the potential adverse impacts of noise and disturbance on residential amenity.

Key local issues

- 13.3. Noise and vibration impacts during the construction phase, relating to the works themselves, notably in the Bealings and Bawdsey areas, the operation of the construction consolidation sites and associated with HGV movements more generally have been a particular concern of the local community.
- 13.4. While the converter station will generate noise during its operation phase, the local authorities have not identified this as an area of concern.

Adequacy of application

- 13.5. At the Section 56 stage, SCC identified a number of concerns and inconsistencies within the noise and vibration assessment submitted with the original application in so far as it related to the impacts of construction

traffic. The SEI rectified these issues and thus SCC is now satisfied that the ES provides an appropriate assessment of effects.

- 13.6. The volumes of HGVs and the consequential impacts on noise levels experienced by receptors is not predicted to be of a level to warrant requirement of mitigation, such as triple glazing, for any affected residences, and thus the noise and vibration impacts of the development as they relate to construction traffic are acceptable.
- 13.7. However, SCC would reiterate its previous comments at the Section 56 stage and in response to the SEI, that while the disturbance experienced by householders would not meet the relevant quantitative thresholds that would indicate noise mitigation is required, the experience of certain households, such as Rose Cottage at the intersection of the B1113 and Bullen Lane in Bramford will be detrimental and the applicant should consider the opportunities for mitigation in these cases.
- 13.8. The Outline Traffic Management Plan (provided for as part of the Outline CoCP by Requirement 27) sets out in Section 1.4 the need for pre-and post construction surveying of the highway network for the purposes of ameliorating any damage to the network by construction traffic. In order to minimise the noise and vibration impacts of construction traffic, the pre-construction survey should also be used to identify any significant irregularities in road surfacing so that they can be treated in advance of construction works.
- 13.9. In terms of construction noise, the DCO provides for a written scheme for noise management to be agreed with the local planning authorities (Requirement 29). This combined with Requirement 30, which limits working hours, should control noise impacts during construction to an acceptable level. Nevertheless, the works will inevitably give rise to localised disturbance to amenity and thus the applicant should ensure that contractors are required, through the CoCP, to use best endeavours to minimise the duration of, and sensitively time, disruptive activities and to deploy appropriate mitigation such as acoustic screening to further reduce disturbance.
- 13.10. Section 6 of the Outline CoCP, which sets out the measures that will be included within the Noise and Vibration Management Plan confirms provisions related to monitoring will be included. A clear process detailing how members of the public can provide feedback or relate concerns should also be included.
- 13.11. With specific reference to the proposed crossing of Lodge Road in Great Bealings - the change in technique described in Chapter 6 of the SEI from a 300m HDD to a shorter one, perhaps 20-25m (though see SCC's response to the SEI noting the lack of clarity on the technique here) will reduce the duration of works in this vicinity to four to six weeks and be restricted to daytime working hours.
- 13.12. This change is welcomed and the local authorities note the corresponding change to Requirement 30 to restrict the working hours here and at Sandy Lane to 07:00 to 19:00 with no activity on Sundays or public holidays in the draft DCO July 2013. These changes are welcomed

and the local authorities consider the development complies with local policies H16 and DM23.

- 13.13. Requirement 31 of the DCO contains provisions relating to noise limits at residences in the vicinity of the converter station. These limits are acceptable to Mid Suffolk District Council, and thus the development complies with its policy H16.

14. SOCIO-ECONOMIC

Mid Suffolk policies

- 14.1. Policy E10 states that the employment opportunities created by industrial development in the countryside will be material to its acceptability.

Suffolk Coastal policies

- 14.2. SP1 and SP6 seek to promote economic activity in the district particularly in rural areas and at the Port of Felixstowe.

Other relevant local policy

- 14.3. The Suffolk Coast and Heaths AONB Management Plan identifies the importance of tourism and recreation to the AONB and the economic benefits derived by the local economy. The Suffolk Growth Strategy and New Anglia Plan for Growth also identify tourism as a key sector for future growth. The latter documents support the development of the renewable sector, but identify that skills levels and shortages are a barrier to growth.

Key local issues

- 14.4. The development has the potential to deliver significant positive benefits, which the local authorities very much welcome. However, our paramount concern has been that every effort should be undertaken to ensure that a significant part of these benefits are localised, in part to offset the negative impacts of the development, for example the disruption during the construction phase (for which no direct compensation is offered).
- 14.5. Specifically, opportunities exist for local businesses to become part of the on- and offshore supply chain for East Anglia ONE and indeed future phases of development. Associated with this are the likely employment prospects that would be available through this avenue and through the provision of indirect services.
- 14.6. Much of the potential for local economic growth hinges on the choice of both base and marshalling ports, which the applicant has not confirmed. Until this is decided and the applicant has taken a Final Investment Decision (FID) on the project, there is a reluctance on the part of the applicant to commit to more substantive investment to either develop the supply chain or undertake initiatives to ensure that the local workforce is adequately skilled to service the project.
- 14.7. Our main concern is that delaying implementation of initiatives that would seek to maximise local economic benefits may mean that local

suppliers and the local workforce are unable to respond to the demands of the East Anglia ONE project either when construction commences or indeed during the operational phase and thus there would be significant leakage of contracts and jobs to companies/individuals outside the region. This would be contrary to local policy to support local economic growth.

- 14.8. The development does not directly affect any sites allocated in Local Plans, or for which planning permission has been granted. However, there is a land use conflict with emerging proposals to construct large scale greenhousing on land in Little and Great Blakenham parishes. SITA UK proposes to develop commercial greenhousing, making use of waste heat from the nearby energy from waste plant (currently under construction and due to become operational in December 2014), to cultivate fresh produce.
- 14.9. A further, though lesser, issue has been the potential for cumulative pressures on the labour force, on the supply chain and on accommodation for workers with other major infrastructure projects, in particular the proposed Sizewell C nuclear power station.
- 14.10. Given the size and likely dispersed nature of the workforce, and in the absence of information relating to port usage, the local authorities do not consider there is likely to be significant effects/pressures on community services.
- 14.11. The potential transport issues arising from port selection are dealt with under Section 15.

Adequacy of application/DCO

- 14.12. Volume 3, Chapter 28 of the ES provides an adequate assessment of effects, with the exception of the possible impact on tourist accommodation and cumulative effects.
- 14.13. The applicant subsequently produced a further report *Assessment of Workforce Effects on Tourism Accommodation Providers in East Anglia* (which is appended to the SoCG), which confirms, based on past trends on occupancy rates, that there would be sufficient capacity for the construction/operational workforce within Suffolk or Norfolk (but note that Harwich, Essex remains a possible port choice). The local authorities accept the findings of the report and consider that the development would not have significant negative effects on the tourism industry – indeed benefits may accrue to local hoteliers for example.
- 14.14. The local authorities also accept, based on their understanding of the timetable for the proposed construction of the Sizewell C development that there is unlikely to be a cumulative impact with East Anglia ONE, though this would likely not be the case for future phases of the East Anglia Array.
- 14.15. The local authorities' concern with the ES was that it did not set out sufficient commitments to mitigate the socio-economic impacts of the development, nor to maximise local benefits.
- 14.16. Subsequently the applicant has issued a series of 'Letters of Intent' to respond to the local authorities' concerns, which go some way to

reassuring us that appropriate initiatives will be undertaken should the development proceed (they are appended to the SoCG).

- 14.17. It is clear from these letters that the applicant has undertaken a range of engagement initiatives with key stakeholders in the skills and business sectors and proposes to continue these and certainly has established a presence in the region. There is a commitment made to collaborate with key partners on a Skills Strategy and Delivery Plan, which would be implemented post FID. We also welcome the confirmation that the *preference* remains to site the base port in the region and that East Anglia Offshore Wind has been working with port operators to identify constraints and opportunities.
- 14.18. Nevertheless, we do maintain concerns that the timespan between FID in 2015 and the start of construction the following year could leave the region 'wrong footed' with the associated risk that not only the regional content target, which 'should be' 30% (see Volume 3, Chapter 28, paragraphs 155-156 of the ES), but also the Government's target of 50% UK content²² are not met. Equally, training initiatives will not deliver immediate results, so it appears unlikely that the implementation of the proposed Skills Strategy would deliver results in time for the construction phase of East Anglia ONE.
- 14.19. The DCO does not set out any requirements with respect to mitigating socio-economic impacts, nor is a section 106/111 or unilateral undertaking proposed. The local authorities, however, having reviewed the Panel Reports and Secretary of State's Decision Letters for the Triton Knoll and Galloper Offshore Windfarms in particular, recognise that in the absence of information concerning the location of ports and thus the distribution of socio-economic impacts, justifying and securing specific mitigation for this purpose is a complicated matter.
- 14.20. On that basis, following the issuing of the Letters of Intent, the local authorities consider that the applicant has provided a reasonable indication of, and commitment to, initiatives that will further socio-economic development in the area, and thus the development would comply with local planning policy in that regard. We do, however, anticipate that this issue should be revisited through the consideration of applications for future phases of the East Anglia Array, when there will be a great deal more certainty over port usage and likely socio-economic impacts.
- 14.21. With regard to the proposed SITA UK development, the local authorities understand that a technically feasible solution has been agreed between the applicant and SITA and are therefore satisfied that the East Anglia ONE project does not prejudice the delivery of what would be an important employment generating opportunity for Mid Suffolk.

15. TRANSPORT & TRAFFIC

²² See <http://www.thecrownestate.co.uk/energy-infrastructure/offshore-wind-energy/working-with-us/offshore-wind-developers-forum/>

Mid Suffolk policies

- 15.1. Policy T10 sets out the highway matters to be considered in assessing applications. These include the provision of safe access on the site, suitability of existing roads in providing free flow of traffic and pedestrian and cyclist safety, the ability of the surrounding road network to absorb traffic generated from the development, the provision for adequate parking and turning of vehicles and the needs of pedestrians and cyclists accessing the development. Policy E10 notes that the acceptability of traffic impacts will be a key consideration in determining whether industrial development will be permitted in the countryside. T2 states attention will be given to securing highway improvements that bring benefit to traffic and pedestrian safety.

Suffolk Coastal policies

- 15.2. Policies DM19 and DM20 relate to parking standards and travel plans and promote the use of sustainable, low carbon forms of transport. DM22 sets out the requirement for safe access to development. SP1 sets out an intention to reduce the overall need to travel but where travel is necessary, to better manage the transport network to enable it to function efficiently.

Other relevant local policy

- 15.3. The Local Transport Plan identifies maintaining the transport networks, tackling congestion, improving access to jobs and markets and encouraging a shift to more sustainable travel patterns as its key objectives.

Key local issues

- 15.4. The number, size, timing and routeing of HGV (and abnormal load) vehicles is a major, and is certainly the most widespread, concern of local communities. The local authorities are aware of the particularly strong feeling on this issue expressed by parishes to the north and east of Ipswich, including Martlesham, Great Bealings, Little Bealings, Grundisburgh and Culpho, Playford, Swilland & Witnesham as well as Kirton and Falkenham and Bawdsey further east.
- 15.5. The particular issues relate to the suitability of such vehicles on rural roads, the damage they may cause to the highway and verge, the conflicts with other users at certain times of the day, including pedestrians where there are no footways, and the general disturbance they generate. The local authorities' views on the latter are expressed in Section 13 above.
- 15.6. The local authorities share the concerns expressed by these parish councils (and indeed other interested parties) and furthermore considers safe access to works and the need to encourage sustainable travel by workers as other key issues.
- 15.7. A final matter raised by the local authorities relates to the potential transport and traffic impacts that are likely to arise in association with an increased level of activity at the selected port(s).

Adequacy of application/DCO

- 15.8. The transport assessment submitted with the application was inadequate in a number of ways as detailed in SCC's Section 56 response (Appendix, paragraphs 28 – 51). While the SEI Information largely addressed the local authorities' technical points regarding the parameters of the transport assessment, we remain concerned that the likely number of HGV movements required to deliver the project may be underestimated (for reasons explained at paragraph 17 of SCC's response to the SEI).
- 15.9. Consequently, the local authorities consider it paramount that an extremely rigorous Traffic Management Plan (TMP) is implemented and enforced for the construction programme to ensure that the impacts of the development traffic remain within the parameters of the transport assessment, and take into account other committed development in the area (as this wasn't part of the submitted transport assessment – this was noted in SCC's response to the SEI, paragraphs 22-26).
- 15.10. The applicant has produced an Outline TMP, in accordance with Requirement 27 and this is appended to our SoCG. The draft TMP contains a number of measures which the local authorities believe are necessary to make the development acceptable. The local authorities have had particular regard to the points raised by the parish councils in agreeing the stipulations within the TMP.
- 15.11. For example, the final TMP will confirm the size of vehicles that can access each part of the construction route network. It will also restrict movements between the primary and secondary construction consolidation sites (CCS) to outside the peak hours. It will require the applicant to seek agreement on the numbers of vehicles that can access the primary CCSs during the peak hours. It will provide for HGV timing restrictions to be implemented where access routes coincide with access to school routes and to take in to account variations associated with the agricultural and tourism high seasons. It will also, in final form, need to include measures to ensure that HGVs are marked in such a way that members of public are able to associate them with the EA ONE project for monitoring and enforcement purposes (this could alternatively be secured via an additional requirement)²³.
- 15.12. Additionally, the applicant will be committed to pre- and post-construction surveys to ensure any damage to the highway is remediated. Finally, the TMP, paragraph 1.7.5 identifies where works to the highway may be required to secure safe access to sites. However, the local authorities consider this arrangement insufficiently robust to ensure that the necessary highway improvements are delivered in advance of construction to the required standards.
- 15.13. Consequently we request an amendment to Requirement 21 to reflect that no stage of construction works should commence until the necessary highway works have been completed to the satisfaction of the relevant highway authority. The Requirement could include a cross reference to

²³ In a similar manner to Requirement PW9, The Hinkley Point C (Nuclear Generating Station) Order 2013

those measures indicated in the TMP, though acknowledge that others may be required. Such works would then be secured via bonded section 278 agreements.

- 15.14. Following feedback from the Parish Councils, the local authorities have required that the TMP reflects that, while highway measures are designed to be temporary (paragraph 1.7.4), consultation with the local highways authority over whether or not they should be retained should be provided for. SCC would have regard to the local community's views in formulating its response at the relevant time.
- 15.15. Alongside the TMP, an Outline Access Management Strategy (AMS) and an Outline Travel Plan have been produced in accordance with Requirements 21 and 32 respectively. The AMS confirms final access details for the CCSs will be agreed with SCC. Based on the provisional drawings it is considered safe access to all the CCSs can be achieved.
- 15.16. The Travel Plan contains sufficient detail to assure the local authorities that appropriate initiatives will be undertaken to support sustainable travel by East Anglia ONE workers. Importantly, it also commits the applicant to working with the relevant highway authority when the port(s) are selected to ensure that parallel measures are undertaken to mitigate transport impacts associated with East Anglia ONE port-related activity.
- 15.17. In summary, the transport and traffic implications of the development can be adequately controlled through the implementation of measures set out in the Outline TMP, AMS and Travel Plan, which are provided for by appropriate requirements within the DCO. The controls and restrictions in there have been designed to minimise the impacts of HGV movements in particular on the local highway network and respond to local issues. The local authorities are currently working with the applicant to examine the monitoring and enforcement mechanisms that will be needed to ensure the documents are adhered to (and thus included in the final version of the TMP), but provided that they are, the development would comply with local planning policy.

16. WASTE MANAGEMENT

Mid Suffolk policies

- 16.1. No relevant policy (refer to the Framework)

Suffolk Coastal policies

- 16.2. SP12 seeks to reduce waste and promote recycling of materials.

Key local issues

- 16.3. Waste management has not been identified as a key issue for the local authorities as significant effects are not envisaged.

Adequacy of application/DCO

- 16.4. The applicant's intention is to reuse spoil created on site as far as possible, thus waste arisings from the trenching process are anticipated to

be minimised. The ES is not otherwise particularly clear on the other sources and quantum of waste that would be generated.

- 16.5. The CoCP (Section 10) provides for the provision of a Site Waste Management Plan (SWMP) which would embed the principles of the waste hierarchy within it. The CoCP also identifies appropriate control measures.
- 16.6. An additional requirement could however be added to the DCO to specifically provide for the SWMP, which would need to be agreed with the local planning authority, in consultation with SCC (as waste disposal authority) and the Environment Agency. The CoCP as written does not provide for an authorisation process for the SWMP.
- 16.7. Subject to this amendment, the development would comply with local policy.

17. WATER QUALITY AND RESOURCES

Mid Suffolk policies

- 17.1. Policy SC4 relates to the protection of groundwater supplies, while CS4 sets out development should have no adverse effect on water quality. E10 notes the prospect of pollution from new development in the countryside will be a material consideration.

Suffolk Coastal policies

- 17.2. SP12 seeks to reduce the use of natural resources and to minimise the risk of pollution.

Key local issues

- 17.3. Impact on water quality has not been identified by the local authorities as a likely significant effect of the development, though we note that additional consents are relevant to this issue, and may necessitate further environmental assessment.
- 17.4. SCC is responsible for issuing Land Drainage consents under the Land Drainage Act 1991 for works affecting ordinary water courses where there is no Internal Drainage Board. Furthermore it will, upon commencement of Schedule 3 of the Flood and Water Management Act 2010 become the SuDs Approval Body (SAB). Depending on the timing of this, East Anglia ONE may or may not require SuDs Approval.
- 17.5. In issuing consents under either authority, SCC/SAB will need to ensure that any works permitted are Water Framework Directive (WFD) compliant. SCC currently awaits guidance however on how it should apply the WFD to water bodies not assessed through the Anglia River Basin Management Plan.

Adequacy of application/DCO

- 17.6. The baseline information in Volume 3, Chapter 22 of the ES only considers the status of the River Gipping in respect of the WFD. It may be that WFD assessments are needed for other watercourses as part of securing Land Drainage consents or any SuDs approval – if the intention

is to discharge to watercourse in the case of the latter. This eventuality is captured in the Outline CoCP, Section 11.4. The CoCP also sets out measures in the following sections to control possible environmental impacts of dry and wet cut crossings as well as more generic pollution-control measures (including related to encountering contaminated land).

- 17.7. The DCO provides for the CoCP to be agreed with the local planning authority. It is suggested that given the specialist knowledge of the Environment Agency on this topic area, they should also be consulted. The local authorities are satisfied that local policy compliance can be achieved through implementation of the CoCP.

18. DESIGN

Mid Suffolk policies

- 18.1. GP1 sets out that poor design and layout will normally be refused in new development and that proposals should instead respond to their setting through their appearance, scale and landscaping. Similarly E12 requires new industrial development to achieve high building design standards and that siting and layout should taken in to account the possible need for future expansion. Policy CS3 requires sustainable construction measures to be deployed in non-residential developments, while CS5 demands high quality design that respects the local distinctiveness and the built heritage. While CL24 relates to wind turbines in the countryside, it notes that particular care should be given to design, siting, and colour of ancillary facilities including transformers and transmission apparatus.

Suffolk Coastal policies

- 18.2. DM21 and DM22 set out the criteria for considering the layout and design of development within the District. It is expected that development should relate to the scale and character of their surroundings.

Key local issues

- 18.3. The main concern of the local community, notably in the Burstall area, and indeed the local authorities, is the design of the converter station and whether adherence to the Design and Access Statement (DAS) (document 9.3) would deliver a building of acceptable design standards.
- 18.4. A secondary concern is the appearance of the kiosks used for cable jointing. This has been discussed in Section 11 above.

Adequacy of application

- 18.5. The DCO, as submitted, sets out that the design of the converter station should accord with the submitted DAS. The local authorities did not consider that the DAS showed sufficient regard to local policies which emphasise the need for the development to be sensitive to place, a strong enough commitment to minimise the scale of the building nor adequate recognition of the interrelationship between design, landscaping, sustainable drainage and ecology.

- 18.6. Consequently the local authorities set out a series of 'Design Principles' by which they felt the discharge of Requirement 18 of the DCO should be governed. Following discussions with the applicant, *Outline Converter Station Design Principles*, has been produced (appended to the SoCG) which address the local authorities' concerns. The applicant has proposed a change to Requirement 18 (see draft DCO July 2013) to make reference to this additional document and similarly added the document to Section 33 of the DCO (*Certification of plans etc*). This is welcomed.
- 18.7. With the production of this document and the associated changes to the DCO, the local authorities' consider that the design of the onshore infrastructure can be adequately controlled to meet the local policy tests.

19. Summary

- 19.1. The local authorities have reviewed the application and evaluated the impacts in the context of the local development plans and other relevant policy.
- 19.2. The local authorities consider that the DCO in combination with the proper implementation of ancillary documents it provides for, or that the applicant has agreed to be bound by, specifically the;
- Landscape and Ecological Management Plan
 - Onshore Written Statement of Investigation
 - Code of Construction Practice including Traffic Management Plan and Access Management Strategy and incorporating a Site Waste Management Plan and Air Quality Management Plan
 - Travel Plan
 - Outline Converter Station Design Principles
 - Surface Water & Drainage Management Plan
 - Noise & Vibration Management Plan
 - Section 106/111 agreement for offsite landscaping within 3km of the converter station.
 - An Artificial Light Emissions Management Plan
 - A Pollution Prevention and Emergency / Incident Response Plan
 - A Contamination Assessment and Mitigation Scheme

will ensure that the impacts of the development are acceptable and thus it accords with local policy.