

FIVE ESTUARIES OFFSHORE WIND FARM STATEMENT OF COMMON GROUND 10.10.18 SUFFOLK COUNTY COUNCIL

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In preparation of this document Five Estuaries Wind Farm Ltd has made reasonable efforts to ensure that the content is accurate, up to date and complete for purpose.

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DEFINITION OF ACRONYMS

Term	Definition
DCO	Development Consent Order
ETGs	Expert Topic Groups
MW	Megawatts
MHWM	Mean High Water Mark
NSIP	National Significant Infrastructure Project
SoCG	Statement of Common Ground
SCC	Suffolk County Council
VEOWF	Five Estuaries Offshore Wind Farm



1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared between Five Estuaries Offshore Wind Farm Limited (hereafter referred to as 'the Applicant') and Suffolk County Council to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Five Estuaries Offshore Wind Farm (hereafter referred to as "VEOWF").
- 1.1.2 Following detailed discussions undertaken between the parties, the Applicant and Suffolk County Council have sought to progress a SoCG. It is the intention that this document provides the Planning Inspectorate with a clear overview of the level of common ground between both parties. This document will be updated if any additional points are identified, or any positions change during the Examination.

1.2 APPROACH TO SOCG

- 1.2.1 This SoCG sets out the topic, a brief summary of the issue or matter subject to disagreement or agreement, the position of the Applicant and that of Suffolk County Council, and a colour coding to illustrate the level of agreement and/or materiality.
- 1.2.2 A full description of the approach adopted is set out in 9.33 Approach to Statements of Common Ground [APP-266] submitted as part of the DCO application.

1.3 THE PROPOSED DEVELOPMENT

- 1.3.1 The Five Estuaries Offshore Wind Farm (hereafter referred to as VE) is the proposed extension to the operational Galloper Offshore Wind Farm. The project includes provision the construction, operation, maintenance for decommissioning of an offshore wind farm located approximately 37 kilometres off the coast of Suffolk at its closest point in the southern North Sea; including up to 79 wind turbine generators and associated infrastructure making landfall at Sandy Point between Frinton-on-Sea and Holland-on-Sea, the installation of underground and the construction of an electrical substation and associated infrastructure near to the existing Lawford Substation to the west of Little Bromley in order to connect the development to National Grid's proposed East Anglia Connection Node substation, which would be located nearby.
- 1.3.2 All onshore connection infrastructure would be located in the administrative area of Tendring District Council, within Essex County Council. VE will have an overall capacity of greater than 100 Megawatts (MW) and therefore constitutes a Nationally Significant Infrastructure Project (NSIP) under the Section 15 (3) of the Planning Act 2008.
- 1.3.3 A full Project description is included in the Environmental Statement, in particular 6.2.1 Offshore Project Description [APP-069] and 6.3.1 Onshore Project Description [APP-083].



2 SUFFOLK COUNTY COUNCIL'S REMIT

2.1 OVERVIEW

- 2.1.1 As the boundary of SCC's administrative area only extends to the Mean High-Water Mark (MHWM), representations are limited to the elements of the Project that have onshore-related impacts (including those from the construction and operation of the offshore wind turbines and associated infrastructure).
- 2.1.2 SCC's role in relation to the DCO process derives from the Planning Act 2008 (the 'Act') and secondary legislation made under the Act. SCC as a county council is classified as a consultee under section 43 of the Act, meaning applicants must consult with SCC before submitting a Nationally Significant Infrastructure Project (NSIP) application.
- 2.1.3 The following application documents have informed the discussions with SCC and address the elements of VE that may affect the interests of the interested party:
 - > 6.2.10 Seascape, Landscape and Visual [APP-079]
 - > 6.2.1 Offshore Project Description [APP-069]
 - > 6.3.1 Onshore Project Description [APP-083]
 - > 6.3.2 Landscape and Visual Impact Assessment
 - > 6.3.3 Socio-Economic, Tourism and Recreation [APP-085]
 - > 6.3.4 Onshore Biodiversity and Nature Conservation [APP-086]
 - > 6.3.5 Ground Conditions and Land Use [APP-087]
 - > 6.3.6 Hydrology, Hydrogeology and Land Use [APP-088]
 - > 6.3.7 Archaeology and Cultural Heritage [APP-089]
 - > 6.3.8 Traffic and Transport [APP-090]
 - > 6.3.9 Airborne Noise and Vibration [APP-091]
 - > 6.3.10 Air Quality [APP-092]
 - > 6.4.2 Human Health and Major Disasters [APP-095]
 - > 9.21 Code of Construction Practice [APP-253]
 - > 9.27 Outline Skills and Employment Plan [APP-260]
- 2.1.4 The main areas of interest raised by SCC were the following:
 - Potential impacts upon the Suffolk Coast and Heaths AONB as a result of offshore infrastructure.
 - Potential impacts upon the Suffolk County Council highways network from potential port traffic and construction traffic for the Lesser Black Backed Gull compensation at Orford Ness.
 - > Potential impacts on employment, skills and education in Suffolk.
 - > Potential traffic impacts, including AILs and use of ports
- 2.1.5 SCC and the Applicant have been working together to minimise possible impacts of the project on the SCC operations.



2.2 CONSULTATION SUMMARY

2.2.1 Since 2019, the project has been engaging with relevant stakeholders through different levels of activity. The project has undertaken the necessary consultations before submitting the application and has held Expert Topic Groups (ETGs) on a number of specific topics, as well as bilateral meetings with key stakeholders. SCC has replied to the Stage 1 consultation and to the Section 42 consultation. The comments received and the meetings between the project and the interested party have informed the basis for this SoCG.



3 AGREEMENTS LOG

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and SCC for each relevant component of the Application identified in paragraph 2.1.3. The tables below detail the positions of the Applicant alongside those of SCC and whether the matter is agreed or not agreed.
- 3.1.2 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion, the agreements logs in the tables below are colour coded to represent the status of the position according to the criteria in Table 3.1 below. Colours were chosen in order to ensure inclusivity for the visibility of data.

Table 3.1: Position Status key

POSITION STATUS	COLOUR CODE
The matter is considered to be agreed between the parties.	Agreed
The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	Ongoing point of discussion
The matter is not agreed between the parties.	Not agreed



Table 3.2: Status of discussions

Reference Number	Topic	Applicant's Position	SCC's Position	Position Status
1	Paragraph 5.10.20 states that for AONBs, assessments should include effects on the natural beauty and special qualities of these areas.	The Applicant agrees that the Project is outside the designated SCHAONB landscape. The Applicant has fully considered the likely significant effects of the VE array areas on the special qualities of the SCHAONB in 6.2.10 Seascape, Landscape and Visual Assessment [APP-079] (pages 208-227 and Table 10.26). The conclusion of this assessment is that the VE array areas will not have significant adverse impacts on the natural beauty and special qualities of the SCHAONB. Due to their location at considerable distance outside the SCHAONB and from the Essex coastline, the VE array areas only impact on the perception of character and qualities – which is considered an indirect effect. Changes to the perceived character occur in views from parts of the SCHAONB, rather than 'on' or 'within' the landscape. Some effects on the SCHAONB have been identified including in relation to specific individual 'special qualities'. These are particularly those aspects that relate to the large open vistas across heaths and along the coast, out to sea and from sea to the coastline; and the juxtaposition of elements in these views, as experienced from parts of the coastal edge of the SCHAONB looking out to sea. The SLVIA has found that the VE array areas would not give rise to significant effects on these views or the perceived character and qualities of the coastline, owing principally to its location at long distance offshore from both the SCHAONB coast of Suffolk (over 37 km to the array areas), together with the position of the VE arrays subsumed behind operational wind farms and the limited additional	SCC agrees with the conclusions of the SLVIA: that the array areas would not give rise to significant effects, but that they would give rise to residual moderate/minor and minor effects including to the natural beaty and special qualities of the SCHAONB.	Agreed
2	The concept of harm and whether any adverse effect equates to harm to the special qualities of the AONB.	lateral spread of the VE WTGs on the sea skyline. The Applicant does not accept that there is harm to the AONB – the nearest turbine would be 37km away from the AONB and a conclusion of harm at this distance would be unprecedented. To equate any residual effect as leading to harm is to say that there is no threshold for harm other than an object may be seen, however distantly, from a designated landscape. The Applicant does not accept this position.	SCC disagrees with the contention that there is no harm to the AONB. SCC does not believe there to be a useful distinction between 'harm' and 'adverse effects'. Further details can be found in SCC's deadline 4 submission Response to the Applicant's comments on our Local Impact Report.	Not agreed
3	Suffolk County Council suggest the Applicant's proposal should be phased so that those elements which would have harmful impacts on the SCHAONB are not permitted to take place until it is clear that the required connection to the National Grid will be provided. SCC considers that the securing of such a	A Grampian condition would fail the tests for planning conditions as applicable to DCO requirements pursuant to the MHCLG guidance 'Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects' (April 2024).	The tests in the MHCLG guidance are that requirements should be: precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects. The draft text provided by SCC in its response to ExQ2 DCO.2.05 meets these tests. The cited	Not agreed



Reference Number	Topic	Applicant's Position	SCC's Position	Position Status
	phasing requirement within any made DCO would be one way in which harm to the SCHAONB could be avoided, unless and until it was shown to be required to deliver the energy benefits of the proposal.	Such a condition is not required to 'prevent harm' as there is no realistic potential for harm to AONB given the significant distance of the project, as discussed in ref 2.	guidance does not set out any prohibition against phasing requirements related to dependencies on other projects. EN-1 states that the deciding Secretary of State should be satisfied that appropriate network arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted (para 4.11.12).	
			SCC does not consider that the phasing requirement is a 'Grampian' restriction, as that term is conventionally understood because it does not seek to preclude the commencement of the project pending the satisfaction of some external event. Having regard to the Applicant's indicated timetable for carrying out the works to construct the wind turbine generators ("WTGs") that would be subject to the restriction (as set out in the construction programme in Figure 1.21 of the Offshore Project Description [APP-069]), the Applicant would be free to undertake all and any of the works programmed for Years 1 to 3 of the construction programme without being limited by the proposed phasing requirement. Further detail is provided in SCC's deadline 4 submissions.	
4	Suffolk County Council consider there to be potential for long-term cumulative adverse visual effects below the significance threshold to affect the perceived character of the wider seascape, the landscape character of LCAs/LCTs within, and the special qualities of the designated landscape.	Based on the detailed assessments undertaken in 6.2.10 Seascape, Landscape and Visual Assessment [APP-079], it is the Applicant's position that the cumulative effect falls below that which would be considered significant in EIA terms. In line with its SLVIA methodology [APP-197] the Applicant considers that the VE array areas would not provide a defining influence on the SCHAONB nor result in a material change to its existing landscape character and special qualities, in which the baseline characteristics will continue to provide the definitive influence. The Applicant's assessment of the special qualities, assessed in detail in the 6.2.10 Seascape, Landscape and Visual Assessment [APP-079] (pages 208-227, Table 10.26 and Table 10.36) finds that many of the SCHAONB special qualities will not be changed at all and will continue to prevail regardless of the proposed development, which will only result in effects on the visual/perceptual aspects of particular scenic qualities of the SCHAONB relating to its long distance and panoramic views out to sea. The Applicant's overall conclusion is that the VE array areas will not have significant adverse impacts on the natural beauty and special qualities of the SCHAONB.	The project has moderate/minor adverse impacts on 32 out of the 35 indicators of special qualities assessed in the SLVIA [APP-079] from paragraphs 10.11.179 to 10.11.280. The only indicators which suffer from minor adverse impact are 'a sense of enclosure and isolation' and 'cultural heritage'. The only indicator which suffers zero adverse impact is 'natural heritage'.	Ongoing point of discussion
5	Duty to seek to further the purpose of conserving and enhancing the natural beauty of the AONB and the premise that all residual (not significant in EIA terms) effects should be taken into account.	The Applicant considers that it has already applied appropriate mitigation relating to seascape, landscape and visual receptors.	SCC disagrees that "the experience of the landscape cannot reasonably be held to be harmed", because that would contradict the Applicant's own environmental statement.	Ongoing point of discussion



Reference Number	Topic	Applicant's Position	SCC's Position	Position Status
		The Applicant submits that the experience of the landscape cannot reasonably be held to be harmed by the addition of turbines that are only theoretically visible in ideal conditions, are set in the context of closer and more prominent windfarms, and at a minimum 37km distant. To adopt this position is equating any visibility with harm. In this context furtherance does not equate to compensation for any and all residual impacts of a scheme. While there is as yet very limited consideration of this duty, the Sheringham and Dudgeon decision did not set the bar for compliance at the level suggested by SCC but rather at the quoted level that the Applicant has taken reasonable precautions to avoid compromising the purpose of the designation. The Applicant considers that the project reasonably conserves the special qualities and features of the SCHAONB and that all reasonable efforts have been made to avoid or minimise significant adverse impacts on the SCHAONB	The project has moderate/minor adverse impacts on 32 out of the 35 indicators of special qualities assessed in the SLVIA [APP-079] from paragraphs 10.11.179 to 10.11.280. The only indicators which suffer from minor adverse impact are 'a sense of enclosure and isolation' and 'cultural heritage'. The only indicator which suffers zero adverse impact is 'natural heritage'. In any case, the duty on the SoS at section 85 of the Countryside and Rights of Way Act 2000 (the "CRoW Act") applies in exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty. The CRoW Act does not distinguish between land in an AONB affected directly or indirectly. Even if the decision would affect the AONB in a neutral way, the SoS would be obliged to seek to further the purposes. Given that the decision will have moderate/minor adverse effects on the special qualities of the area of outstanding natural beauty, the SoS will be bound to ensure that the consent for this project contains measures to seek to further the purpose of conserving and enhancing the natural beauty, special qualities, and key characteristics of the area of outstanding natural beauty. 'To seek to further' does not mean to minimise impacts. The measures must clearly be directed towards a positive effect (even if there is no requirement that they actually achieve that outcome), and paragraph 5.10.8 of EN-1 makes clear that any measures must be sufficient (as well as appropriate and proportionate). The part of the Sheringham and Dudgeon decision quoted by the applicant does not capture the test applied by the SoS in that case. The SoS's had to be satisfied that the project took all possible steps to further the purpose of the designation. To conclude that it would be sufficient to merely avoid compromising the purpose of the designation is a selective reading of the decision which is incompatible with the text of the duty itself. The Sheringham and Dudgeon decision was also made before the publication of t	



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			guidance makes it clear that the duty is an active one which requires to both avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities and key characteristics of the AONB and its setting. SCC does not consider that the applicant complies with this guidance.	
6	Concerns whether the Worst Case Scenario (WCS) has been appropriately assessed.	In line with the Rochdale Envelope approach to EIA (Planning Inspectorate Advice Note Nine: Rochdale Envelope (PINS, 2018), the maximum height WTG that could be installed under the DCO is assessed in the SLVIA as the worst-case scenario (APP-079, table 10.17), in which the number of WTGs will not exceed 41 at the 399m maximum tip height, used as the maximum design scenario in the EIA. The 'range of configurations' or differences in effects resulting from the two extremes of the project design does not need to be assessed, as the worst-case scenario has been assessed under the Rochdale Envelope approach. There is no conflict with Section 85 CROW Act and the approach taken by the Applicant, as demonstrated by numerous consented offshore wind DCOs that have taken the same approach. There is no overarching obligation to define the 'least harmful option' particularly when there is no harm to the designation (see ref 3)	SCC agrees that the 'range of configurations' is consistent with a Rochdale Envelope approach. SCC's concerns are that a Rochdale Envelope approach may be in tension with the duty under section 85 of the CROW Act. SCC considers that the default position should be that only the least harmful option should be taken forward if that option is also able to achieve the objectives of the project. There may be a justification for greater level of harm than the minimum, for example for project delivery reasons but this would need to be clearly demonstrated. SCC has concluded that, subject to justification, a Rochdale Envelope approach can be consistent with the duty, but the range of harms will need to be accounted for in the proportionality (as per 5.10.8 of EN-1) of the positive measures which seek to further the purposes of the AONB.	Ongoing point of discussion
7	Securing the Rochdale envelope parameters for WTGs in the DCO	The parameters used to define the Rochdale envelope for WTGs (maximum number, maximum tip height and maximum swept area) is an appropriate means of constraining the project to that which has been assessed through the EIA. This approach has been accepted on a number of previous offshore wind DCOs.	SCC agrees that the parameters selected are appropriate for the control of offshore wind WTG arrays.	Agreed
8	Production of a Port Construction Traffic Management Plan.	The Applicant maintains its position that a Port Construction Traffic Management Plan is not required. The same would apply to any other ancillary facility, factory or other location (e.g. a waste disposal site) where vehicles that may support the project would use, but which would be managed under consents and any required traffic management plans associated with those sites. Such sites, including any port, will have assessed traffic impacts associated with the use of their facility as part of their consent, and there is no reason why project-related traffic should be considered any differently or cumulatively to any other user of an existing port. Whether a port has an up-to-date planning permission is a matter for the port and the relevant planning authority, it is not for the Applicant to supplement a lack of planning enforcement.	As stated in its post-hearing submission for ISH3, SCC notes that several ports within Suffolk may not have up-to-date planning permission due to the history of these ports extending beyond the formation of legislation which requires planning permission for such facilities. Therefore, it is not necessarily the case that the Applicant's activities are included within the permitted use of these ports. SCC recognises the need for the Applicant to retain flexibility in terms of its use of ports to respond to the dynamic nature of construction and operation of the offshore arrays and considers that such flexibility can be worded into the port traffic management plan. SCC has supported its decision with examples of such plans being formed with little friction by other applicants of offshore wind farms off the coast of Suffolk, meaning that the request is not unprecedented and is appropriate to this type of development.	Ongoing point of discussion



Reference Number	Topic	Applicant's Position	SCC's Position	Position Status
			SCC also considers a port traffic management plan to support sustainable travel due to the good public transport connections ports within Suffolk typically have. Such a management plan would then enable the Applicant to show compliance with paragraphs 5.14.7, 5.14.8, 5.14.9 and 5.14.18 of EN-1. SCC has not seen evidence contradicting the notion that travel plans support sustainable transport and would contend that travel plans which do not do so are poorly strategised and implemented. SCC is happy to work with the Applicant during the formation of this plan given its extensive experience of travel plans produced and implemented by undertakers of other NSIPs in Suffolk in recent years.	
9	Language inserted into a suitable control document (such as the Outline Construction Traffic Management Plan [APP-257]) for Lesser Black Backed Gull compensation construction works at Orford Ness which ensures that the impacts are either negligible or appropriately managed.	The Applicant does not see any need for a specific control document such as a Construction Traffic Management Plan for the scope of the works at Orford Ness and associated likely vehicle movements. There is already a requirement to seek approval for a construction method statement which for the minimal traffic associated with these works is sufficient. Requirement 18 of the dDCO states that (amongst others) details of 'vehicular and pedestrian access for construction' must be approved ahead of commencement. The planning application for the near-identical works for the Norfolk projects concluded that no such plan was required due to their being no potential for traffic disruption, and the Applicant's position is that the same would apply here. As the construction method statement covers other matters not related to traffic, it is not appropriate for	SCC considers that the construction method statement referenced in requirement 18 of the dDCO is sufficient to deal with the concerns previously raised by SCC regarding the proposed compensatory construction works at Orford Ness. Since the requirement relates to vehicular and pedestrian access, SCC considers it to be within its competency as the relevant highways' authority. Therefore, SCC requests that it be the discharging authority for this element of the requirement. Alternatively, SCC could be made a statutory consultee to the discharging authority for this requirement, however this is option is not preferred by SCC due to it being the relevant highways authority.	Ongoing point of discussion
10	Potential impacts on migratory bats and the need for mitigation in the form of wind turbine curtailment	SCC to be the discharging authority. The Applicant, as identified in [REP1-049] and in response to the SCC LIR, has concluded that the available evidence shows that the level of activity is not likely to be high in the area of the proposed development. As there are, therefore, no likely significant effects, no mitigation measures have been proposed. The proposed mitigation measures, as noted by SCC, cannot be assumed to be appropriate or necessary for all OWFs. The OESEA4, whilst providing a literature review of the evidence around offshore bat migration, does not provide conclusions or recommendations for UK offshore wind farms.	The SoS will need to demonstrate that any decision made is compliant with the UK's treaty obligations in regard to both Eurobats and the Aarhus convention on migratory species. This is a matter on which Natural England ("NE") will need to advise the ExA and SoS, not a matter for Suffolk County Council. SCC notes and aligns itself with Natural England's advice given in response to ME.2.10 of ExQ2.	Not agreed
11	Requirement for a clear commitment that there is consultation with Suffolk County Council to coordinate various employment skills matters to ensure that the maximum benefit is gained from the measures in the skills strategy.	Suffolk County Council is not a host authority, and given that a very small proportion of the local workforce is anticipated to be drawn from Suffolk (given the relative proximity of urban centres in Tendring and Colchester which together have a	SCC considers that its request for a clear commitment that there is consultation with Suffolk County Council to coordinate various employment skills matters to ensure that the maximum benefit is gained from the measures in the skills strategy has been met by the	Ongoing point of discussion



Reference Number	Topic	Applicant's Position	SCC's Position	Position Status
	Suffolk County Council request to be a statutory consultee of the discharging authority for Requirement 16.	construction labour pool of 16,000 workers), there is no requirement for mitigation of an impact and the Applicant does not consider it necessary for Suffolk County Council to be a named statutory consultee of the discharging authority of Requirement 16. The Applicant within 9.27 Outline Skills and Employment Plan [APP-260] has committed to continued engagement on the development of the Skills and Employment Plan with a number of key stakeholders (including SCC) (see section 5.1 and 5.2). This is considered to address this issue.	Applicant in its OSES. However, were this not to be translated into the version of the SES submitted for approval, SCC would have no recourse unless it were a consultee of requirement 16. As detailed in section 4.3 of its comments on deadline 3 submissions, SCC understands the consensual basis upon which activities within the SES will rely upon and wishes to promote this through its request to be a named consultee for requirement 16. Being a named consultee, as opposed to an optional one, ensures that SCC receives procedural fairness in its consultation as it will have more time to give an adequate response and be informed of any extra information. It is for this reason that SCC considers it necessary. SCC does not consider this request to be a form of mitigation, nor does it justify the request on this basis. SCC's request is only justified in the interests of procedural fairness and good requirement construction.	
12	Requirement for the Applicant to minimise impacts arising from AIL movements, including assessing the suitability of routes and committing to notify local authorities and the Suffolk Constabulary sufficiently in advance of such movements.	The Applicant considers existing regulations to be sufficient in controlling AIL movements and managing impacts, therefore any other form of control simply serves to duplicate existing controls. The Applicant notes the SCC concerns over the notice period and is proposing to include additional drafting in the Outline Construction Traffic Management Plan – Rev D examples include in para 2.1.3 "Supporting the Applicant with highway stakeholder engagement, including early engagement with the relevant highway authorities on the timescales and potential routing for the planned AIL movements to minimise disruption" and section 7.2 – Special Order Deliveries. "7.2.2 The location that the reactors would be delivered from is unknown at this stage. An assessment of the route once identified, would be undertaken and discussed with the relevant highway authorities in advance of any notification being issued/movements." The Applicant hopes this addresses SCC's concern.	SCC understands that the Applicant may wish to transport AlLs through Suffolk depending on various factors. However, SCC is concerned that the Applicant has not undertaken the level of assessment which it has done for the proposed route from the Port of Harwich for possible ports it would use in Suffolk. There are several reasons behind SCC's concerns surrounding AlL movements. Firstly, existing legal requirements for timings of notifications of such movements are minimal. For AlL movements, including SMOs, local authorities must be given at least between 2 and 5 days' notice, with the Suffolk Constabulary only having to be given 2 days' notice. Such legislative requirements are not sufficient to minimise impacts from this project due to the potentially high volume of AlL movements which could occur within Suffolk as a result of this project. As there has been no commitment to limit the number of AlL movements through Suffolk, with the exception of transformers, SCC has to assume the worst-case scenario at this moment. Both SCC and the Suffolk Constabulary are at capacity in terms of resources in managing AlL movements. With the increasing influx of major energy projects happening within Suffolk, there are increasing cumulative pressures on these limited resources. Moreover, SCC does not have the capability to suggest alternative routes if the proposed route is	Ongoing point of discussion



Reference Number	Applicant's Position	SCC's Position	Position Status
		structurally adequate, even if it causes unnecessary adverse impacts and is impractical. Therefore, SCC requests for there to be adequate controls put in place to ensure that the impacts of concern are sufficiently minimised.	



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