



**N O R T H F A L L S**

*Offshore Wind Farm*

## **Statement of Common Ground**

Suffolk County Council

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## Glossary of Acronyms

CEA	Cumulative Effects Assessment
DCO	Development Consent Order
DESNZ	Department of Energy Security and Net Zero
EIA	Environmental Impact Assessment
ESDAL	Electronic Service Delivery for Abnormal Loads
ETG	Expert Topic Group
NGET	National Grid Energy Transmission
NSIP	Nationally Significant Infrastructure Project
OCSS	Offshore Coordination Support Scheme
OCTMP	Outline Construction Traffic Management Plan
OSEP	Outline Skills and Employment Plan
PEIR	Preliminary Environmental Impact Report
PTMP	Port Traffic Management Plan
SLVIA	Seascape Landscape and Visual Impact Assessment
SoCG	Statement of Common Ground
TTSA	Traffic and Transport Study Area

## Glossary of Terminology

The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
The Project or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.
Onshore substation	A compound containing electrical equipment required to transform and stabilise electricity generated by the Project so that it can be connected to the National Grid.
Landfall	The location where the offshore export cables come ashore at Kirby Brook.

# 1. Introduction

## 1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared by North Falls Offshore Windfarm Limited (the Applicant) and Suffolk County Council. It identifies areas of North Falls Offshore Wind Farm (hereafter ‘the Project’ or ‘North Falls’) where matters are agreed, not agreed or that remain under discussion between the parties.
2. The Applicant has had regard to the Planning Inspectorate (2024) guidance regarding Statements of Common/Uncommon Ground for Hearings and Inquiries when compiling the SoCG.
3. This SoCG has been structured to reflect topics of the application which are of interest to Suffolk County Council. The applicable matters considered within the SoCG apply to Suffolk County Council statutory and non-statutory remit.
4. Table 1.1 presents the topics included in the SoCG with the Applicant and Suffolk County Council.

**Table 1.1 Topics included in the SoCG**

Topic/Chapter	Development Consent Order (DCO) Document Reference
Chapter 27 Traffic and Transport	APP-041
Chapter 29 Seascape, Landscape and Visual Impact Assessment	APP-043
Chapter 31 Socio economics	AS-010
Chapter 32 Tourism and Recreation	APP-046
Co-ordination Report	APP-236

6. Topic specific matters agreed, not agreed, and matters that remain under discussion between the Applicant and Suffolk County Council are included within this SoCG. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and Suffolk County Council to reach agreement on each matter whatever possible or refine the extent of disagreement between parties.
7. Throughout the SoCG the phrase “Agreed” identifies any point of agreement between the Applicant and Suffolk County Council. The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and Suffolk County Council.

## 1.2 Consultation with Suffolk County Council

8. The Applicant has engaged with Suffolk County Council on the project during the pre-Application process, both in terms of informal non-statutory

engagement and formal consultation carried out pursuant Section 42 of the Planning Act 2008.

9. During formal (Section 42) consultation, Suffolk County Council provided comments on the Preliminary Environmental Information Report (PEIR) by way of letter dated 14<sup>th</sup> July 2023.
10. Further to the statutory Section 42 consultation, several meetings were held with Suffolk County Council through the EPP. These are detailed in Table 2.1 of this SoCG, Consultation Report **[APP-215]** and minutes of the meetings.

### 1.3 Summary of Agreed, Not Agreed and In Discussion

11. In order to easily identify whether a matter is 'agreed', 'not agreed', or 'in discussion' the position status colour coding system set out in Table 1.2 is used in the SoCG.
12. Details of specific topics that are 'agreed', 'not agreed', or 'in discussion' between the Applicant and Suffolk County Council are presented in Table 2.2 to Table 2.8.

**Table 1.2 Position status key**

Position Status	Position Colour Coding
<b>Agreed.</b> The matter is considered to be agreed between the parties.	Agreed
<b>Not Agreed- no material impact</b> The matter is not yet agreed between the parties however the outcome of the approach taken by either the Applicant and Suffolk County Council is not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG. Discussion on these matters have concluded.	Not Agreed- no material impact
<b>Not Agreed- material impact</b> The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant and Suffolk County Council is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	Not Agreed- material impact
<b>In discussion</b> The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties (e.g. where the documents are yet to be shared with Suffolk County Council.	In discussion

## 2. Statement of Common Ground

13. A summary of the consultation undertaken to date with Suffolk County Council and the matters agreed or not agreed between the Applicant and Suffolk County Council (based on discussions and information exchanged between the Applicant and Suffolk County Council during the pre-application phase of the Application) are set out below for each of the SoCG topic areas.

### 2.1 Consultation

**Table 2.1 Summary of Consultation with Suffolk County Council.**

Date	Contact Type	Topic
<b>Pre-Application</b>		
November 2018	Environmental Constraint Consultation Event	Appraisal of constraints around the area sought for the array areas from the Project.
April to May 2021	Written consultation	Terms for the North Falls EIA/ HRA Evidence Plan Process.
June 2021	Presentation	Introductory Session to the Project.
June to July 2021	Workshops (Expert Topic Group (ETG) meetings)	Pre-scoping ETG meetings undertaken in accordance with the Projects Evidence Plan process.
December 2021	Workshops (ETG meetings)	Post- Scoping ETG meetings undertaken in accordance with the Projects Evidence Plan process.
March 2022 to February 2023	Workshops (ETG meetings)	Pre-PEIR ETG meetings undertaken in accordance with the Project's Evidence Plan process
March 2022 to February 2023	Workshops (ETG meetings)	Pre-PEIR ETG meetings undertaken in accordance with the North Fall's Evidence Plan process.
September 2023 to May 2024	Workshops (ETG meetings)	Post-PEIR ETG meetings undertaken in accordance with the North Falls Evidence Plan process.
14 <sup>th</sup> July 2023	PEIR response	PEIR response Section 42 responses provided by Suffolk County Council
<b>Post-Application</b>		
17 <sup>th</sup> October 2024	Relevant Representation	Suffolk County Council response to the relevant representation consultation.



**Table 2.2 Topics agreed, in discussion or not agreed in relation to Traffic and Transport**

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Traffic and Transport			
1	<p><b><i>Traffic and Transport Study Area</i></b></p> <p>Section 27.3.1 of the Environmental Statement Chapter 27 Traffic and Transport <b>[APP-041]</b> details the extents of the traffic and transport study area (TTSA) as agreed with Essex County Council (the relevant local highway authority) and National Highways (responsible for the A120 and A12). It can be noted that no links extend into the administration area of Suffolk County Council and outside of TTSA, North Falls' traffic is deemed have disbursed onto the wider highway network.</p> <p>Section 27.3.1 of the Environmental Statement Chapter 27 Traffic and Transport <b>[APP-041]</b> further outlines that routes that extend outside of the TTSA are where construction traffic has dissipated and therefore, significant effects upon users of the highway network are unlikely.</p>	<p>SCC previously raised concerns in its relevant representation ("RR") and Local Impact Report ("LIR") [REP1-074] regarding potential impacts on the A12 and Suffolk's highway network for Suffolk road users and businesses. SCC recognises that the TTSA has been agreed with Essex County Council, the host authority for highways impacts, and so defers to their position.</p>	Agreed

ID	The Applicant Position	Suffolk County Council Position	Position Summary
2	<p><b>Abnormal Loads</b></p> <p>Appendix 27.2 Abnormal Indivisible Load Access Report [REP1-008] identifies a preferred route for special order abnormal loads to move the Projects transformer from the nearest suitable port of Harwich (in Essex).</p> <p>Appendix 27.2 Abnormal Indivisible Load Access Report [REP1-008] also identifies a potential route for shunt reactors and considers a route via A120 and A12 toward Colchester and onward toward the M25. Neither route would traverse Suffolk County Council's road network.</p> <p>In addition to the movements of the larger abnormal indivisible loads (transformers and shunt reactors) abnormal loads (such as plant and cable drums) may be required. These could originate from within Essex or further afield.</p> <p>Section 2.5.2 of the OCTMP [REP4-008] outlines that the highway authorities, police and Network Rail will be notified to agree appropriate timings, routes and asset protection measures through the established Electronic Service Delivery for Abnormal Loads (ESDAL) process. The OCTMP [REP4-008] also outlines that it is therefore proposed that prior to submitting the formal approval via ESDAL, the contractor would first consult with the relevant local highway authorities to seek their views in regard to the best routes to be used and size of vehicles.</p>	<p>If any AILs originate from ports in Suffolk, Suffolk County Council would need to be consulted at an early stage to identify impacts and any consequent works to facilitate or mitigate these movements.</p> <p>SCC understands that the Applicant may wish to transport AILs 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.</p> <p>There are several reasons behind SCC's concerns surrounding AIL movements. Firstly, existing legal requirements for timings of notifications of such movements are minimal. For AIL 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 AIL movements which could occur within Suffolk as a result of this project.</p> <p>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 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.</p>	In discussion

ID	The Applicant Position	Suffolk County Council Position	Position Summary
3	<p><b>Base Ports</b></p> <p>The preferred base port (or ports) for the offshore construction, operation and decommissioning of the Project is not known and any decision would not be expected until post-consent. Such facilities would be existing or would be provided or brought into operation by means of one or more planning applications by port operators or as port operations with permitted development rights.</p> <p>It has therefore been agreed with National Highways (at a meeting on the 7 June 2022) and Essex County Council (at a meeting on the 9 July 2021) to scope out of the assessment the onshore impacts of traffic and transport associated with offshore construction, operation and decommissioning activities.</p> <p>The Applicant does not consider that a Port Traffic Management Plan (PTMP) Requirement is required noting that the DCO is not seeking permission for a base port for the construction or operation of the Project. Noting that the DCO would not grant permission for a base port(s), the means by which a base port would be brought into operation would therefore be as follows:</p> <ul style="list-style-type: none"> <li>a) A preferred port(s) is selected which has the requisite planning permissions; or</li> <li>b) A preferred port(s) is selected where permissions are not in place and new permissions would be sought from the respective planning authority.</li> </ul> <p>The Applicant does not consider that a PTMP meets the test of being necessary.</p>	<p>SCC previously suggested the implementation of a Port Traffic Management Plan to manage traffic impacts that arise at any port as a result of the offshore elements of the proposal. However, SCC is now satisfied that HGV movements associated with port activity will be minimal. Moreover, the Applicant will have to gain relevant permissions for traffic movements at ports if such activities are not within the envelope of the port's permissions.</p>	Agreed

ID	The Applicant Position	Suffolk County Council Position	Position Summary
4	<p><b>Decommissioning</b></p> <p>Section 27.6.3 of ES Chapter 27 Traffic and Transport <b>[APP-041]</b> includes details of the decommissioning assessment. The Applicant also directs Suffolk County Council to the Draft DCO <b>[AS-022]</b> which includes a specific Requirement which requires a written scheme of decommissioning to be prepared and submitted to the relevant planning authority at least six months prior to any decommissioning work commencing.</p>	Decommissioning and removal routes also need careful consideration, whether at consenting stage or through a robust post-consent approvals process.	Agreed

**Table 2.3 Topics agreed, in discussion or not agreed in relation to Seascape, Landscape and Visual Impact Assessment**

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Landscape and National Landscape Area</b>			
1	The Applicant agrees that it is unlikely there are effects on the Suffolk and Essex Coast and Heaths National Landscape. The Applicant asserts that the methodology used in ES Chapter 29 Seascape, Landscape and Visual Impact Assessment <b>[APP-043]</b> and Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast – Technical Note <b>[REP5-038]</b> are robust and are in accordance with Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and best practice.	<p>SCC's initial position regarding effects on National Landscapes was that it considered it unlikely that there would be significant effects on the Suffolk Coast and Heaths National Landscape Area. However, following the publication of the Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast - Technical Note <b>[REP3-044]</b>, SCC has raised concerns over the methodology used by the Applicant regarding its assessment of the project's impacts on the special qualities of the SECHNL.</p> <p>Table 4 of the revised technical note on the assessment of the SECHNL's special qualities <b>[REP5-038]</b> provides the Applicant's assessment of the scale of change the proposals will have on the special qualities, for several of which the scale of change is identified as medium, as summarised in paragraph 24. Paragraph 26, however, states that the magnitude of impact on the National Landscape and its special qualities (a receptor of high sensitivity) is assessed to be low. Whilst SCC appreciates the detail added to this technical note at deadline 5, SCC remains unclear on the reasoning process that has allowed a series of medium scale of change effects on the special qualities to then be said to come to a low magnitude of impact. In particular, the Applicant has not specified how it has combined judgements about, scale of change, geographical extent, duration and reversibility of impact in order to come to its conclusions for each impacted special quality. In the SLVIA Methodology <b>[APP-170]</b>, it is stated that scale of change is often the "dominant factor" in making judgements on magnitude of effect. It is not clear to SCC that this has been</p>	In discussion

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Landscape and National Landscape Area			
		<p>carried forward into this technical note and the Applicant has not specified why this is the case.</p> <p>SCC disagrees with the Applicant's view that it is appropriate to reduce the materiality of impacts on special qualities of the SECHNL (particularly those arising in the coastal parts of the SECHNL with views out to the proposed development) by reference to the fact that they are only a part of the overall AONB. SCC considers that the materiality of an adverse impact on a special quality stands in its own terms, because each special quality is an intrinsic part of the AONB. SCC does not consider it appropriate to say that the effects on special qualities are diminished because the special qualities are only affected in certain areas.</p>	
2	<p>The Applicant has submitted a plan showing the Onshore Substation Zone of Theoretical Visibility and Viewpoint Locations with Dedham Vale National Landscape <b>[REP4-047]</b> at Deadline 4. The Applicant also submitted updated versions of the visualisations provided in ES Chapter 30 Figures <b>[APP-083]</b> to <b>[APP-088]</b>, which show the developments considered within the cumulative effects assessment in ES Chapter 30 Landscape and Visual Impact Assessment <b>[APP-044]</b>, at Deadline 4. Please refer to <b>[REP4-029]</b> and <b>[REP4-030]</b>. The Applicant's position on the CRoW Act duty is set out in <b>REP5-068</b>.</p>	<p><b>Discharging the updated duty in s85 CRoW Act 2000 duty</b></p> <p>The duty on relevant authorities 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 2000 does not distinguish between land in an AONB affected directly or indirectly. Therefore, the Applicant must demonstrate how it has complied with the duty.</p> <p>SCC considers that the Applicant has failed to meet the requirement of 'to seek to further the purposes of conserving and enhancing natural beauty' of the SECHNL. Whilst the northern array area has been removed from the application, the application at present adversely affects the natural beauty of the SECHNL and no enhancement proposals are included within the</p>	In discussion

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Landscape and National Landscape Area			
		<p>application. Therefore, SCC does not consider that the Applicant seeks to further the purposes of conserving and enhancing the natural beauty of the SECHNL as required by s85 of the CRoW Act 2000. SCC has suggested possible measures which could be undertaken to comply with the duty in its Local Impact Report. 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).</p>	
		<p><b><u>LVIA assessment of onshore substation and cumulative effects on the Dedham Vale National Landscape</u></b></p> <p>SCC makes the point that there remain unassessed locations of theoretical visual influence in the Dedham Vale Area of Outstanding Natural Beauty ("DVAONB"). Whilst this is unlikely to meet the threshold of a significant effect, the Applicant must nevertheless ensure that it complies with the updated wording of s85 of the Countryside and Rights of Way Act ("CROWA") 2000 which requires the Applicant to seek to further the purposes of protected landscapes affected by the proposed development. The duty, as written, is not limited in its application only to instances where significant adverse effects on designated landscapes are identified.</p> <p>SCC welcomes the additional wirelines showing the Norwich to Tilbury Pylons. However, with regards to VP8, the question remains as to why this location was chosen, where the ZTV suggests limited visibility, and not a location on the Essex Way further south-west where the ZTV suggests greater visibility. In ISH1 and the Applicant's corresponding written summary [REP4-026], the Applicant states that unassessed ZTV are outside of the</p>	<p>In discussion</p>

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Landscape and National Landscape Area			
		2km study area. However, the location referenced here by SCC is closer to the proposed substation than viewpoint 8, meaning that it is within the 2km study area. SCC considers that the inclusion of this viewpoint would benefit the examination in deciding whether the DVNL is affected by the proposed development.].	
3	<p>Suffolk County Council has proposed a DCO Requirement that imposes a phasing restriction on undertaking works to construct the offshore turbines until it is clear that the East Anglian Connection Node (EACN) has been consented and is to be delivered as part of the Norwich to Tilbury project. The Applicant considers that a DCO Requirement as proposed by Suffolk County Council fails the relevant legal tests for a Requirement because it is not necessary and is unreasonable:</p> <ul style="list-style-type: none"> <li>• There is a presumption in favour for granting consent for the Norwich to Tilbury project as set out in the relevant NPSs because it is critical national priority infrastructure. The Applicant has a connection agreement with NESO pursuant to which it is required to provide a connection and NESO has identified the EACN as the connection point. • The Applicant is not aware of any precedent for the imposition of a requirement of this sort and considers that there is no basis to consider the Project as 'exceptional' such that a requirement of this type would be justified here even though it is not normally regarded as necessary and not supported by policy in the NPS.</li> <li>• It is unreasonable to require the Applicant to wait until the proposed requirement can be discharged because this would create a significant delay to the Project making its delivery by 2030 unachievable.</li> <li>• The Applicant also has a series of decisions to make when preparing its bid for CfD, engaging with the supply chain and</li> </ul>	<p><b>Phasing requirement</b></p> <p>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 LIR [REP1-074] meets these tests. The cited 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 Table 5.23 of the Project Description [APP-019]), 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.</p> <p>Further detail is provided in SCC's deadline 4 and 5 submissions: [REP4-095] and [REP5-117].</p>	Not agreed



ID	The Applicant Position	Suffolk County Council Position	Position Summary
Landscape and National Landscape Area			
	<p>placing orders that would be adversely affected if it could not rely on its DCO as enabling implementation to proceed without such a restriction. This is likely to delay the implementation of urgently needed critical national priority renewable energy infrastructure and/or hamper its delivery.</p> <ul style="list-style-type: none"> <li>• The precedent effect of a decision to impose a condition of this type could also have wider consequences for the rapid delivery of offshore wind and the ability of the sector to meet the urgent need for increased generating capacity set out in the NPSs.</li> <li>• The Applicant has set out in its oral submissions at ISH2 that there are many precedents for generating stations being consented at a point when the associated grid connection project was further back in the consenting process. This includes Hinkley Point C for which development consent was granted a year before the application for the related connection project was submitted. No equivalent requirement was imposed on the Hinkley Point C DCO.</li> </ul>		

**Table 2.4 Topics agreed, in discussion or not agreed in relation to Socio-Economics and Skills**

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Socio-Economics and Skills</b>			
1	<p>The Applicant has considered a wide range of relevant published material, including policies and strategies, to establish the socio-economic context for the project and to inform the assessment of baseline conditions.</p> <p>The relevance of key policy and strategy documents (including the Economic Strategy for Norfolk &amp; Suffolk, Suffolk County Council Energy Infrastructure Policy) to the socio-economic assessment is considered in Table 31.7 of ES Chapter 31 Socio-Economics <b>[AS-010]</b>.</p> <p>The Technical Skills Legacy Report sets out the workforce needed within the construction and engineering sectors to deliver the forecast regional infrastructure over the next 15 years in Suffolk and Norfolk. This report was considered in Section 3.2, paragraph 54 and the Appendix Section A.6.2, paragraph 143 of Outline Skills and Employment Plan (OSEP) <b>[APP-253]</b>. The Applicant notes the importance that such strategies and evidence provide which are relevant to employment and skills planning, and they will continue to be important reference points for further developing the Outline Skills and Employment Strategy <b>[APP-253]</b> into a full Skills and Employment Plan (post DCO consent).</p> <p>It should be noted that while Suffolk is part of the construction labour market, the Project is likely to draw to a greater extent on Essex's construction sector and its labour force.</p>	<p>Suffolk County Council acknowledges that the Applicant has drawn on key regional documents to shape the socio-economic narrative. However, the Council considers that this reference is largely descriptive and not yet operationalised within the project's workforce planning, assessment of local impacts, or proposed mitigation measures.</p> <p>In particular:</p> <p>The Technical Skills Legacy Report, while cited in the OSEP <b>[APP-253]</b>, is not reflected in any quantifiable workforce modelling or defined mitigation strategy. The report identifies a significant skills shortfall at Levels 2–4, which should inform targeted interventions.</p> <p>The socio-economic baseline does not account for regional labour market pressures from overlapping NSIPs such as Sizewell C, Sea Link and Bramford to Twinstead. No worst-case scenarios are tested for local workforce absorption or displacement.</p> <p>Despite acknowledging the Regional Skills Coordination Function (RSCF), the Applicant has not yet committed to integrating this function formally into the governance or monitoring framework of the post-consent Skills and Employment Plan.</p> <p><b>Priority Request to Reach Agreement:</b></p> <ol style="list-style-type: none"> <li>1. A commitment to co-develop the final Skills and Employment Plan with Suffolk's RSCF (and Essex County Council, reflecting the shared labour market geography).</li> </ol>	In discussion

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Socio-Economics and Skills			
		<p>2. Agreement to incorporate specific local evidence and data (e.g. from the Technical Skills Legacy Report, SCC's Supplementary Guidance Document on Skills and Workforce) into the final SEP, including defined KPIs, delivery mechanisms and monitoring arrangements.</p> <p>Suffolk County Council is keen to work constructively with the Applicant to secure a locally grounded, evidence-based strategy that ensures regional skills needs are met and cumulative labour market pressures are effectively managed.</p>	
2	<p>SCC has been engaged multiple times throughout the development of the Outline Skills and Employment Plan (OSEP) [APP-253] and continues to be engaged by the Applicant in the further evolution of the SEP. This includes a request to be named as a consultee to the discharging authority for the Skills and Employment Plan. Currently, as the host authority, ECC is the discharging authority for the Skills and Employment Plan.</p> <p>The Applicant is aware that SCC coordinates the various employment skills matters and activity within Suffolk, which would feed into the SEP.</p>	<p>SCC has requested to be a named consultee to the discharging authority for the Skills and Employment Plan.</p> <p>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 Applicant in its OSEP. However, were this not to be translated into the version of the SEP submitted for approval, SCC would have no recourse unless it were a consultee of requirement 18.</p> <p>As detailed in paragraphs 9.34 to 9.39 of its LIR [REP1-074] SCC understands the consensual basis upon which activities within the SEP will rely upon and wishes to promote this through its request to be a named consultee for requirement 18. 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.</p>	Not agreed

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Socio-Economics and Skills			
		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.	
3	<p>A study was undertaken by BVG Associates to assess the economic impact of North Falls. BVG Associates have significant experience in assessing the economic impact of offshore wind farms. The study followed best practice approaches to assessing the economic impact of offshore wind farms by assessing the potential expenditure of the project and the extent to which this expenditure would be retained in the local area under different scenarios. It then applied economic multipliers to the assumed level of retained expenditure in different scenarios to derive the economic impacts.</p> <p>The report is provided in ES Appendix 31.1 Socio-Economics Technical Baseline <b>[APP-171]</b>. It identifies the gross level of Full Time Equivalent (FTE) employment and Gross Value Added (GVA) estimated to result from the construction, operation and decommissioning of North Falls. A methodology is included within the ES Appendix 31.1 (Section 2) and detailed information is provided on local content in the supply chain (Section 3), which can provide a useful indication of the types of jobs which may be required. The outputs of this study have been used to determine the effects on employment and economic value within Section 31.6 of ES Chapter 31 Socio-Economics <b>[AS-010]</b>.</p> <p>In addition, Table 6.1 within the OSEP <b>[APP-253]</b> provides an overview of the types of local direct employment opportunities that may be available to local people as a result of the</p>	<p>Suffolk County Council acknowledges the BVG study and the OSEP as a baseline effort. However, SCC is unable to determine the sufficiency of the Applicant's socio-economic impact assessment without access to the detailed workforce assumptions, disaggregated by project phase, occupation, and geography.</p> <p>The current approach provides headline FTE and GVA figures but lacks the granularity needed to assess local labour market feasibility or develop a proportionate training and inclusion strategy. This gap is particularly concerning given known cumulative pressures from other NSIPs in the region.</p> <p>Table 6.1 of the OSEP lists indicative job types, but without quantified phase-specific data, it is not possible to assess whether the local and regional workforce can realistically meet the project's needs, or what additional interventions will be required.</p> <p><b>Priority Request to Reach Agreement:</b> SCC requests that the Applicant provide a disaggregated, phase-by-phase workforce demand profile by occupation (Standard Occupational Classification), including forecast timing, skill levels, and indicative geographic sourcing. This should inform the final Skills and Employment Plan and be developed in partnership with SCC's Regional Skills Coordination Function and Essex County Council.</p>	In discussion

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Socio-Economics and Skills			
	development, project management, installation, commissioning and operations, maintenance and service of North Falls.	This is essential to ensure the Plan aligns with local labour capacity, enables proactive training and supply chain interventions, and delivers measurable local benefit.	
4	<p>It is noted and also welcomed that Suffolk County Council and other stakeholders are willing to work with the Applicant to ensure alignment between the Skills and Employment Plan for North Falls and actions to support local education, skills and employment opportunities.</p> <p>Section 8 of the OSEP [APP-253] provides further information about how the Applicant has engaged, and will continue to engage, with key consultees (listed in Table 8.1) on the content of the OSEP as it is further developed. Subject to securing DCO consent the OSEP would be developed into the final Skills and Employment Plan, as secured through DCO Requirement.</p>	The promoter's commitment to prepare and implement an Employment, Skills and Education Strategy is welcomed and Suffolk County Council would be willing to work with the promoter to ensure that there is alignment between the strategy and ongoing local activity supporting education, skills and employment to ensure that the strategy can have as great an impact as possible. This would be in line with Suffolk County Council's energy infrastructure policy which requires promoters to undertake comprehensive and effective engagement with Suffolk County Council and supply chain partners to maximise the local business opportunity, skills inspiration and employment benefits. SCC expects the final SEP to commit the Applicant to engaging with SCC's Regional Skills Coordination Function to ensure that duplicate and discordant activities are avoided, and that mutually beneficial activities are pursued.	Agreed

**Table 2.5 Topics agreed, in discussion or not agreed in relation to Community Benefits and Project Legacy**

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Community Benefits and Project Legacy</b>			
1	<p>It is envisaged that a community benefit fund will be established upon commencement of operation of the wind farm. The Applicant will consult on the terms and conditions of this fund post DCO award.</p> <p>Environmental Statement Chapter 29 Seascape, Landscape and Visual Impact Assessment [APP-043] records the assessment of impacts on the communities along the Suffolk coast. Table 29.14 (page 54) to Table 29.19 records (page 61) the magnitude of visual effect on coastal communities. Generally, the visual impacts are low to medium.</p> <p>It is common that community benefit is offered to those communities whom are directly impacted by the presence of infrastructure during construction. During the operation phase, community benefit is targeted to those communities whom continue to host infrastructure during the operational phase.</p>	<p>Community benefits should be in addition to the required secondary mitigation for the development, including those based on the requirements following the government's consultation on Community Benefits.</p>	Agreed
2	<p>[APP-043] 3.1.31 Environmental Statement Chapter 29 Seascape, Landscape and Visual Impact Assessment records the assessment of impacts on the communities along the Suffolk coast. Table 29.14 (page 54) to Table 29.19 records (page 61) the magnitude of visual effect on coastal communities. Generally, the visual impacts are low to medium.</p> <p>It is common that community benefit is offered to those communities whom are directly impacted by the presence of infrastructure during construction. During the operation phase, community benefit is targeted to those communities whom continue to host infrastructure during the operational phase.</p>	<p>Suffolk County Council encourages the promoter to consider such community benefit options and would be happy to discuss how community benefit suitable for the locality could be incorporated. It considers that, given the visual impacts on the Suffolk coast, an element of community benefit should be considered for those communities affected. SCC recognises that the focus of community benefits will be in Essex but believes that Suffolk should also be considered.</p>	

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Community Benefits and Project Legacy</b>			
2	Permanent road improvements that are proposed to help facilitate the construction of the North Falls onshore substation is considered by North Falls Offshore Wind Farm Ltd to be a road safety legacy benefit. In addition, the delivery of Biodiversity Net Gain is also considered as a legacy benefit.	Suffolk County Council also encourages the promoter to consider legacy opportunities of all elements of their development.	Agreed

**Table 2.6 Topics agreed, in discussion or not agreed in relation to Tourism and Recreation**

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Tourism and Recreation</b>			
1	<p>Impacts on tourism of offshore wind farm developments is provided in Section 32.5.6 of ES Chapter 32 Tourism and Recreation <b>[APP-046]</b>, which found that a significant majority of studies identify no deterrent to people visiting or returning to an area as visitors as a result of changes in perception and behaviour resulting from offshore wind farm developments and their associated infrastructure. The chapter notes [see paragraph 32.5 4.3.4] that Suffolk Coast and Heaths National Landscape is located around 13km north of the proposed landfall for North Falls at its closest point, and 40.1km from the nearest turbine. It also refers [paragraph 32.5.6.3] to the presence of several OWFs that form part of the existing seascape from the Suffolk Coast, the majority operational before 2019.</p> <p>Drawing on the evidence presented in the Chapter, the assessment found that there would be a minor adverse effect from North Falls construction on the volume and value of tourism, and a negligible effect during its operation, which are not significant in EIA terms.</p> <p>The construction period for the project is short-term and the temporary impacts of onshore construction will be transient and reversible, and will be managed through measures set out in management plans including the Outline Code of Construction Practice <b>[REP5-002]</b>, the Outline Construction Traffic Management Plan (OCTMP) <b>[REP4-008]</b> and the Outline Landscape and Ecological Management Strategy <b>[REP5-024]</b>.</p> <p>Cumulative effects of North Falls in combination with other OWFs and related infrastructure, and Sizewell C, are assessed</p>	<p>Suffolk County Council anticipates that the project, given its location close to the Suffolk Coast &amp; Heaths National Landscape Area and Dedham Vale National Landscape Area and other rural areas of Suffolk of importance to the tourism economy, could have residual impacts upon visitor perception, and visitor numbers, both during construction and during operation. SCC recognises the assessments undertaken by the Applicant and that despite some adverse effects during construction and in combination with other projects, these effects will not be significant.</p>	Agreed



ID	The Applicant Position	Suffolk County Council Position	Position Summary
Tourism and Recreation			
	in Tables 32.26 and 32.27 of ES Chapter 32 Tourism and Recreation <b>[APP-046]</b> , identifying minor and adverse effects which are not significant in EIA terms.		

**Table 2.7 Topics agreed, in discussion or not agreed in relation to Offshore Coordination**

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Offshore Coordination</b>			
1	The Applicant's Co-ordination Report <b>[AS-006]</b> sets out North Falls' long-term engagement in the Offshore Transmission Network Review, (OTNR commencing from 2020) and then subsequently, the Department of Energy Security and Net Zero (DESNZ) project, the Offshore Coordination Support Scheme (OCSS).	Suffolk County Council has a clear preference for a coordinated approach between the different proposed offshore windfarm extension projects and multi-purpose interconnector projects within the vicinity of this project. SCC recognises that these options have been explored by the Applicant and that the government has chosen not to support the OCSS.	Agreed
2	<p>On the 3 September 2024 (two months after North Falls DCO submission), the Secretary of State for DESNZ decided not to grant further funding to explore the potential for offshore cable and offshore grid connection coordination as part of the OTNR "Early Opportunities" workstream and advised key stakeholders accordingly. Whilst the workstream identified that an offshore cable and grid connection point was technically feasible, it identified the potential for significant additional costs and delay.</p> <p>While the Secretary of State has decided not to grant further funding for this workstream, an offshore cable coordinated connection point remains a grid connection option within the North Falls DCO application.</p>	Whilst Suffolk County Council has a preference for greater offshore co-ordination, SCC recognises that these options have been explored by the Applicant and that the government has chosen not to support greater offshore coordination. SCC notes that an offshore cable coordinated connection point remains a grid connection option within the North Falls DCO application.	Agreed

**Table 2.8 Topics agreed, in discussion or not agreed in relation to Cumulative Impacts**

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Cumulative Impacts</b>			
1	A detailed cumulative effects assessment (CEA) has been carried out, the results of which are detailed in Section 31.8 of ES Chapter 31 Socio-Economics <b>[AS-010]</b> .	Given the number (approximately 5 NSIPs reaching statutory consultation stage in 2023/24) of Nationally Significant Infrastructure Projects and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with the other projects is particularly important	In discussion
2	<p>Cumulative effects of North Falls' construction considered alongside other major infrastructure projects, including Sizewell C Nuclear Power Station, are assessed in Table 31.53, ES Chapter 31 Socio-Economics <b>[AS-010]</b>. The potential for the construction of North Falls and other construction projects in Essex and Suffolk to generate employment opportunities is assessed as a major beneficial effect, recognising their combined potential to generate thousands of jobs across the area over an extended period of time, driven primarily by the construction of Sizewell C.</p> <p>The Applicant recognises that a strategy to prepare the area to manage the labour, skills and supply chain demand expected to be generated is necessary. The need for workforce planning and measures to respond to sustained demand for construction skills and labour, and the challenges and opportunities this presents for the development of the supply chain, are recognised in the OSEP <b>[APP-253]</b>.</p> <p>Section 2.2 to 2.4 in particular point to current challenges in terms of construction recruitment, and to the scale of the demand that infrastructure projects are likely to create in future. The Applicant has committed to working with Suffolk County Council and other key stakeholders to further develop the OSEP, which would become a full Skills and Employment</p>	<p>Suffolk County Council welcomes the Applicant's recognition of cumulative pressures and the commitment to collaborative development of a final Employment and Skills Plan. However, the Council considers that further work is needed to fully understand and address the cumulative workforce impacts arising from overlapping Nationally Significant Infrastructure Projects in Suffolk and the wider region.</p> <p>To support an effective and coordinated response, SCC considers it essential that the final Employment and Skills Plan is informed by a cumulative workforce impact model, developed jointly with local authorities SCC and the Regional Skills Coordination Function (RSCF). This should provide a quantified assessment of labour demand by phase and skill type, explore displacement risks, and identify proportionate mitigation measures to maintain local labour market resilience.</p> <p>The Council looks forward to working with the Applicant to ensure these issues are addressed through the final Plan.</p> <p><b>Priority request:</b> The Council requires a cumulative workforce impact model and mitigation plan be codeveloped with Local Authorities and the Regional Skills Coordination Function, to inform the final Employment and Skills Plan. This must include quantified demand by phase and skill, analysis of displacement</p>	In discussion

ID	The Applicant Position	Suffolk County Council Position	Position Summary
Cumulative Impacts			
	<p>Plan to be secured as a requirement of the DCO should consent be secured.</p> <p>Churn is part of a functioning labour market and a characteristic of the construction sector which has to be responsive to the timing and flow of projects and contracts. The suggestion of additional displacement implies that a loss of business would occur in other parts of the study area economy as result of the project and its in-combination effects. The Applicant does not accept that this is an inevitable outcome, and the development of an Employment and Skills Plan is intended to ensure that measures will be put in place to capitalise on the business opportunities the projects present, and to provide the capacity within the study area's economy to respond to these opportunities.</p> <p>The assessment of the cumulative effects of North Falls with other major infrastructure projects is set out in ES Chapter 31 Socio-Economics <b>[AS-010]</b>. The Applicant recognises that securing a higher contingent of local workers in the construction workforce could be considered as both an opportunity to grow the study area's economy, and a challenge in ensuring that capacity is strengthened in terms of the labour supply and business base if the opportunity is to be realised. The assessment identifies the potential to generate substantial direct local employment and wider employment, including supply chain business in the study area as a major, beneficial effect and therefore as an opportunity rather than a disbenefit.</p> <p>An OSEP <b>[App-253]</b> is submitted with the DCO application. This recognises the scope of activity that may be necessary to develop the local skills base and related supply chain, and to</p>	<p>risk, and agreed mitigation measures to support labour market resilience.</p>	

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Cumulative Impacts</b>			
	<p>provide capacity to respond to the demand that multiple infrastructure projects could generate. It suggests a series of themes to be developed further to address the potential need to improve and increases the availability of skills in the area, encourage people to work in construction and related industries, For the North Falls project the Applicant is committed to engaging with Suffolk County Council, together with other key stakeholders, in the further development of the OSEP. A full Employment and Skills Plan would be secured as a requirement of the DCO should consent be secured, setting out specific measures to be taken in support of the education, training, skills development and recruitment that will be necessary.</p> <p>The Applicant also notes that a prudent and evidence-based approach has been taken to estimating the likely balance of local and out-of-area construction labour required for the North Falls project. This is set out at section 31.6.1.3 of ES Chapter 31 Socio-Economics <b>[AS-010]</b>, with further analysis of both workforce demand and supply chain potential provided in ES Appendix 31.1 <b>[APP-171]</b>.</p>		
3	<p>The cumulative effects of North Falls construction with other major infrastructure projects including Sizewell C Nuclear Power Station are assessed in Table 31.53, ES Chapter 31 Socio-Economics <b>[AS-010]</b>. It refers in Table 31.5 to mitigation embedded into North Falls design that includes the preparation of an OSEP <b>[APP-253]</b> to mitigate issues which might arise with the supply of labour, and to enhance opportunities relating to skills and employment. The Applicant is aware that Suffolk County Council, East Suffolk Council and NNB Generation Company (SZC) Ltd Energy signed a Deed of Obligation pursuant to the Development Consent Order for</p>	<p>The construction period for this project is predicted to occur during the middle of the construction period for Sizewell C Nuclear Power Station. It is anticipated that there would be significant cumulative pressure on the available workforce. This could reduce the opportunities for securing any skills and employment legacy from the construction workforces as the projects would be occurring in parallel.</p> <p>Suffolk County Council expects the promoter to develop a demonstrable understanding of the wider development environment for their project, and to work with Suffolk County</p>	In discussion

ID	The Applicant Position	Suffolk County Council Position	Position Summary
<b>Cumulative Impacts</b>			
	<p>Sizewell C which included measures (Schedule 7) relating to employment, skills, education and the supply chain, and which would be expected to address issues relating to the demand for and supply of labour for its construction.</p> <p>Sections 2.2 and 2.3 of the OSEP recognises current challenges to labour supply in the construction sector in Essex and Suffolk. Section 2.4 recognises the demand that Sizewell C Nuclear Power Station's construction, together with that of North Falls, Five Estuaries and a further 12 major infrastructure projects is likely to generate for construction skills and labour, and recognises both the challenges and opportunities this represents to the construction sector in Essex and Suffolk. The OSEP identifies themes [Table 8.3] including local supply chain and recruitment approaches, education, support for the transition of workers into the industry and support for diversification of the workforce which will guide the identification and development of actions in the final Skills and Employment Plan to ensure that opportunities for skills development and employment are realised, and that challenges to recruitment and the supply of the construction workforce across the supply chain are addressed. The final SEP is secured under a DCO Requirement and would be developed post-consent.</p>	Council and other promoters to manage and mitigate these impacts.	

### 3. Signatures

14. The above SoCG is agreed between the Applicant and Suffolk County Council on the day specified below.

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of Suffolk County Council

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of North Falls Offshore Wind Farm Limited



**NORTH FALLS**

*Offshore Wind Farm*



## **HARNESSING THE POWER OF NORTH SEA WIND**

*North Falls Offshore Wind Farm Limited*

*A joint venture company owned equally by SSE Renewables and RWE.*

*To contact please email [contact@northfallsoffshore.com](mailto:contact@northfallsoffshore.com)*

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