

EAST PYE SOLAR

EN0110014

Local Impact Report

Suffolk County Council

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Glossary of Acronyms

AC	<i>Development Consent Order</i>
AIL	<i>Abnormal Indivisible Loads</i>
AONB	<i>Area Of Natural Beauty</i>
BESS	<i>Battery Energy Storage System</i>
DCO	<i>Development Consent Order</i>
ES	<i>Environmental Statement</i>
ESDAL	<i>Electronic Service Delivery for Abnormal Loads</i>
ESSCS	<i>Employment, Skills and Supply Chain Strategy</i>
ExA	<i>Examining Authority</i>
FE	<i>Further Education</i>
HE	<i>Higher Education</i>
HGV	<i>Heavy Goods Vehicle</i>
LIR	<i>Local Impact Report</i>
LRN	<i>Local Road Network</i>
MHCLG	<i>Ministry for Housing, Communities and Local Government</i>
MW	<i>Megawatts</i>
NSIP	<i>Nationally Significant Infrastructure Project</i>
PA2008	<i>Planning Act 2008</i>
PINS	<i>Planning Inspectorate</i>
PPA	<i>Planning Performance Agreement</i>
PV	<i>solar photovoltaic</i>
RSCF	<i>Regional Skills Coordination Function</i>
SRN	<i>Strategic Road Network</i>
SSI	<i>Site of Special Scientific Interest</i>

“The Council” / “SCC” refers to Suffolk County Council.

Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a Local Impact Report (“LIR”) detailing the policy context, assessment of impacts, and required mitigation and/or compensation. The assessment of impacts has been separated by service area. Examination Library references are used throughout to assist readers.

Overview

1 Introduction

- 1.1 Suffolk County Council (“SCC”) is a statutory consultee for Nationally Significant Infrastructure Projects (“NSIPs”) which involve works within or neighbouring its administrative area. Officers have scrutinised the proposals submitted by the Applicant and have spoken with local communities and local Councillors.
- 1.2 This Local Impact Report (“LIR”) has been prepared in accordance with Section 60(3) of the Planning Act 2008 (as amended) and having regard to the guidance for Local Authorities provided by the Planning Inspectorate (“PINS”),¹ and the Ministry for Housing, Communities and Local Government (“MHCLG”) Planning Act 2008 (“PA2008”) guidance for the Examination stage for NSIPs.²
- 1.3 In this LIR, SCC seek to set out its concerns to the Examining Authority (“ExA”). The Council hopes to influence improvements to the proposed development, in the interests of the local communities, so that the Development Consent Order (“DCO”) (if made) presents the best version of the scheme achievable.
- 1.4 The East Pye Solar proposals consist of construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development, including a Battery Energy Storage System (BESS), ancillary infrastructure, customer substations and Grid Connection infrastructure (including a new National Grid substation). The project has a planned generation capacity of 500MW.
- 1.5 The proposed development would allow for the generation and export of over 100 Megawatts (MW) Alternating Current (AC) of renewable energy and is therefore considered a Nationally Significant Infrastructure Project (NSIP).
- 1.6 The Order Limits, comprising several industrial sites, is located within the administrative boundaries of Norfolk County Council and South Norfolk District Council, covering approximately 1,212.3 hectares of land in total.
- 1.7 Whilst no part of the proposed development lies within Suffolk, SCC is considered a statutory consultee for the application as a neighbouring local authority. As a neighbouring authority, SCC’s interest in the proposed development is restricted only to matters relating to Suffolk which is reflected in the contents of this submission. In this case, the matters of interest to SCC relate to traffic and transport, particularly movements of Abnormal Indivisible Loads, and economy, skills and tourism. In what follows, the Council details its

¹ <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities>

² <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>

concerns within these areas for which further information and changes to submitted documents are required in the Council's view.

- 1.8 This representation sets out in the first section the SCC's key issues, with the second part (in Appendix A) providing detailed technical comments. Given the extent and nature of the matters of concern to SCC.

Suffolk County Council's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy 2026

- 1.9 SCC adopted its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy on 24 February 2026, superseding the previous version of the policy adopted in May 2023. The purpose of this policy is to outline how, in principle, the Council will engage and influence other parties to ensure the interests of communities are prioritised as far as possible in terms of minimising, mitigating and compensating for adverse impacts and securing high-quality, meaningful community engagement. SCC has published guidance on community wellbeing and engagement which is considered essential for the promoter to follow³.
- 1.10 The policy is relevant for the Council's position on the East Pye Solar proposals, and states:
- "Projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."*⁴
- 1.11 The Council will follow this approach in this submission and throughout the Examination process.
- 1.12 The Council consider it essential that an effective Planning Performance Agreements (PPAs), or other appropriate charging mechanism, is agreed with the promoter. Its Energy and Climate Adaptive Infrastructure Policy states:
- "The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council's engagement with project promoters."*

³ For further information, see Energy and Climate Adaptive Infrastructure Policy: Community Engagement and Wellbeing <https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

⁴ See Suffolk County Council's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy 2026: <https://www.suffolk.gov.uk/asset-library/scc-energy-water-commercial-transport-and-adaptive-infrastructure-policy-240226-final.pdf>

- 1.13 Further details on the position SCC adopts in relation to PPAs can be found in its published guidance for project promoters.⁵
- 1.14 SCC considers it essential for the Applicant to consult SCC's relevant Supplementary Guidance Documents for Traffic and Transport⁶ and Socioeconomics and Skills⁷ matters in relation to the application. The concerns raised in this submission reflect what SCC expects from NSIP applications as set out in these guidance documents.

⁵ See Suffolk County Council's expectations for Planning Performance Agreements (PPAs) for Nationally Significant Infrastructure Projects (NSIPs) – Guidance for project promoters:

<https://www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf>

⁶ Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance Document: Traffic and Transport <https://www.suffolk.gov.uk/asset-library/TransportTraffic-InfraPolicy.v4.2.pdf>

⁷ Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance Document: The Socio-economic Effects of NSIPs including the assessment of skills, workforce, and supply chain requirements <https://www.suffolk.gov.uk/asset-library/nsip-socioeconomic-effectnsips.v6.pdf>

2 Terms of Reference

Introduction

- 2.1 East Pye Solar (referred to as “East Pye” or “the Applicant”) has submitted a DCO application for the construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development, including a Battery Energy Storage System (BESS).
- 2.2 This Local Impact Report addresses the local impacts of the proposals.

Scope

- 2.3 The LIR relates to the impacts of the proposed scheme as it affects the administrative areas of Suffolk County Council which is an upper tier local authority.
- 2.4 This LIR does not describe the Works any further, relying on the Applicant’s descriptions as set out in the DCO application documents.
- 2.5 SCC has experience with the NSIP process, through pre-application to post-decision activities including the Discharge of Requirements (“DOR”). SCC has been a statutory consultee on various NSIPs, these include Offshore Wind Farms (i.e. East Anglia One, East Anglia Three, East Anglia One North, East Anglia Two, Fives Estuaries, North Falls), Solar Farms (Sunnica Energy Farm), Electricity Transmission Infrastructure (Bramford to Twinstead), and a Nuclear Power Station (Sizewell C).
- 2.6 Suffolk County Council is also familiar with a promoter’s responsibilities under the Planning Act 2008 (“PA2008”) regime, having successfully promoted the Lake Lothing Third Crossing DCO in Lowestoft – now operational and known as the Gull Wing Bridge.

Purpose and Structure of the LIR

- 2.7 Section 60(3) of the Planning Act 2008 defines Local Impact Reports as:
- i. *“a report in writing giving details of the likely impact of the proposed development on the authority’s area (or any part of that area).”⁸*
- 2.8 The Planning Inspectorate (“PINS”) Advice note one: Local Impact Reports, which advises:
- ii. *“In coming to a decision, the Secretary of State must have regard to any LIRs that are submitted by the deadline. Local authorities are therefore strongly encouraged to produce LIRs when invited to do so.”*
 - iii. *“Local authorities should cover any topics they consider relevant to the*

⁸ <https://www.legislation.gov.uk/ukpga/2008/29/section/60>

impact of the proposed development on their area.”

- 2.9 This LIR provides an overview of policies relevant to all issues, then details local impacts by issue. First, outlining a summary of the concerns relevant to that discipline or issue, then policy context (including the Council’s Relevant Representations), before detailing the local impact assessment for that issue. This assessment is broken down into construction, operational, and decommissioning phase impacts. Further detail on the concerns and required mitigation to improve these will be provided, where appropriate.
- 2.10 Where the Applicant has sought to address these concerns, these will be referenced to the application documentation, including the DCO articles, requirements and obligations where relevant.

3 Description of the Area

- 3.1 The proposed route for Abnormal Indivisible Loads (AIL) routing will be delivered by sea to ports at Felixstowe or Kings Lynn. Whilst the final port of entry is still under consideration SCC will comment on the description of areas along the proposed routing of AILs from Felixstowe, along the A14 onto the A140 as detailed in the Environmental Statement (ES) Volume 3, Appendix 11.1 – Transport Assessment [EN0110014/APP/6.3.11.1] Para 7.2⁹.
- 3.2 The town of Felixstowe has transport links through the A14, the A14 is also used for the operation of the Port of Felixstowe
- 3.3 The A14 is characterised by dual carriageways, the road begins at the port of Felixstowe and links up to the A140 just before Needham Market. The road itself crosses over Orwell bridge and the Orwell Estuary SSSI. The A14 also crosses over the Suffolk Coast and Heaths Area of Outstanding Natural Beauty(AONB).
- 3.4 The A140 is an A road that links to the A14 in Suffolk. The road is situated by rural landscapes on either side, with properties and businesses facing onto the A140.

4 Policy Context

National Policy

A Green Future: Our 25 Year Plan to Improve the Environment

- 4.1 The “A Green Future: Our 25 Year Plan to Improve the Environment” document is the Government’s high level environmental strategy which includes targets in a number of relevant areas.¹⁰

The UK’s Industrial Strategy

- 4.2 By 2035, the Government has the ambition for the UK to be a global leader in Clean Energy Industries, and to become a world-leading exporter of low-carbon products, services and innovation.¹¹

National Policy Statements

- 4.3 When considering NSIP proposals under the Planning Act 2008 the relevant Secretary of State will refer to National Policy Statements (“NPS”).
- 4.4 Overarching NPS for Energy (“EN-1”) is the overarching national policy statement

⁹ [EN0110014-000238-6.3.11.1 Environmental Statement Volume 3 Appendix 11.1 Transport Assessment Part1.pdf](#)

¹⁰ <https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf>

¹¹ <https://www.gov.uk/government/publications/industrial-strategy-sector-plans/sector-plans>

for energy and was published in July 2011, updated in November 2025 which came into force in January 2026. This sets out the UK Government’s commitment to increasing renewable generation capacity and recognises that in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind.¹²

- 4.5 NPS for Renewable Energy Infrastructure (“EN-3”) is the UK Government’s strategy for renewable energy infrastructure.¹³
- 4.6 NPS for Electricity Networks Infrastructure (“EN-5”) is the UK Government’s strategy for electricity network infrastructure. This policy statement applies to not only transmission systems but also associated infrastructure such as substations and converter stations. This policy statement sets out the general principles that should be applied in the assessment of development consent application across the range of energy technologies.¹⁴

National Planning Policy Framework

- 4.7 The National Planning Policy Framework (“NPPF”) was last updated in August 2026 and provides national policy in respect of proposals under the Town & Country Planning Act 1990. It is however also a material consideration when considering NSIP proposals.¹⁵

Community Benefits

- 4.8 The Government published social research and analysis report on the topic of community benefits, for electricity transmission network infrastructure, on 21 March 2024. This document includes communities view and preferences towards community benefits, noting that 67% of residents were supportive of community benefits for transmission infrastructure and 69% were interested in co-designing a community benefit scheme.¹⁶
- 4.9 On 10 March 2025, the Government published its guidance document concerning Community Funds for Transmission Infrastructure. This details the voluntary approach to community benefits for electricity transmission infrastructure, outlining that community benefits should: delivery what communities want, support the capacity and capability of communities, result

¹²<https://assets.publishing.service.gov.uk/media/65bbfbdc709fe1000f637052/overarching-nps-for-energy-en1.pdf>

¹³<https://assets.publishing.service.gov.uk/media/65a7889996a5ec000d731aba/nps-renewable-energy-infrastructure-en3.pdf>

¹⁴<https://assets.publishing.service.gov.uk/media/65a78a5496a5ec000d731abb/nps-electricity-networks-infrastructure-en5.pdf>

¹⁵https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

¹⁶<https://assets.publishing.service.gov.uk/media/65f89eeaca3670001a13a348/community-benefits-electricity-transmission-network-infrastructure.pdf>

in a lasting legacy, be flexible to adapt to community preferences, and secure fairer and more transparent outcomes.¹⁷

- 4.10 The Government consulted on a mandatory approach to community benefits for low carbon energy infrastructure between 21 May and 16 July 2025. Subject to parliamentary approval, this would apply to projects over 5MW which have yet to commence by late 2027.¹⁸

Local Policy

Development Plan

- 4.11 The full text of the relevant Development Plan policies can be found Babergh and Mid Suffolk Joint Local Plan Part 1¹⁹.
- 4.12 The planning services of the Babergh District and Mid Suffolk District Councils were merged in April 2019. Joint development plan documents are currently being developed. At the time of writing part 1 of the local plan has been adopted as planning policy. Part 2 remains undeveloped as a new local plan is being produced.
- 4.13 Relevant policies include Policy LP29 which states that significant impacts on highway safety or the function of the highway network must be mitigated. Impact on highway safety must not be unacceptable and the residual cumulative impact on the road network must not be severe.

5 Other Relevant Local Policy

- 5.1 The following paragraphs note several additional documents produced and endorsed by the relevant authorities which represent local policy on specific

¹⁷ <https://assets.publishing.service.gov.uk/media/67cef18c54faabbadf916090/community-funds-for-transmission-infrastructure.pdf>

¹⁸ <https://www.gov.uk/government/publications/community-benefits-and-shared-ownership-for-low-carbon-energy-infrastructure>

¹⁹ [babergh-and-mid-suffolk-joint-local-plan-part-1-nov-2023](#)

topics which the Councils consider of relevance to the proposed developments.

- 5.2 Suffolk County Council, as Local Highway Authority (“LHA”), published the Suffolk’s Local Transport Plan 2025-2040.²⁰
- 5.3 Suffolk County Council has also published a Green Access Strategy, which is a rights of way improvement plan, covering the period 2020 to 2030.²¹

²⁰ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/suffolks-local-transport-plan-2025-2040>

²¹ <https://www.suffolk.gov.uk/asset-library/imported/suffolk-green-access-strategy-2020-2030.pdf>

Impacts by Issue

6 Economy, Skills, and Tourism

Summary

Skills, Education and Employment

- 6.1 Suffolk County Council acknowledges that the Environmental Statement (ES) identifies the relevant national policy framework supporting renewable energy development and recognises the potential for socio-economic benefits associated with major infrastructure. However, the Council considers that the application documentation does not provide sufficient evidence to robustly identify, assess or secure these benefits at a local level and therefore limited weight should be afforded to the conclusions reached.
- 6.2 SCC's consultation responses consistently sought a demand-led, spatially defined and evidence-based assessment of workforce and skills, including clear identification of labour market geographies, workforce composition and delivery mechanisms. The Council notes that although the ES and Outline Employment, Skills and Supply Chain Strategy (ESSCS) have evolved, these core requirements have not been fully addressed.
- 6.3 While the ES Chapter 14 and the Outline ESSCS formally reference a wider geographic area including Suffolk, the assessment is substantively centred on Norfolk. Suffolk is not analysed as a distinct or functional labour market area, and there is limited evidence of workforce modelling, skills capacity assessment or delivery mechanisms relating specifically to Suffolk. As a result, the documents do not provide a robust assessment of cross-boundary labour market effects or demonstrate how socio-economic benefits would be realised within Suffolk. This represents a material limitation of the assessment and further reduces the weight that can be attributed to the claimed socio-economic benefits.
- 6.4 Chapter 14 identifies employment generation during construction and operation; however, the assessment does not demonstrate how these opportunities would translate into meaningful benefits for the local or regional workforce. The ES indicates that only a very small proportion of jobs would be realised locally, with the majority of employment supported outside the host and neighbouring areas. This reflects high assumed levels of leakage and reliance on non-local labour, yet the implications of this for local economic benefit are not adequately assessed. As a result, the magnitude and significance of beneficial effects for local residents are overstated.

- 6.5 The assessment does not meet the requirements of SCC's Supplementary Guidance on the Socio-Economic Effects of NSIPs, which were clearly articulated through consultation. In particular, the ES does not adopt a sufficiently granular, demand-led approach or define workforce and supply chain geographies by phase and skill level. The reliance on simplified spatial assumptions and absence of a clearly defined functional labour market represents a substantive evidential deficiency. This prevents a robust assessment of workforce sourcing, labour market behaviour and interaction with existing conditions, including those in Suffolk as part of a shared labour market with Norfolk.
- 6.6 The ES also does not adequately assess labour market constraints, including skills shortages, training capacity, and barriers to local labour participation. Although the baseline identifies a mismatch between workforce supply and skills demand and a reliance on imported labour, this is not translated into an assessment of labour market capacity or delivery constraints. There is limited consideration of further education provision, apprenticeship pipelines or alignment with local skills strategies. As a result, the sensitivity of the labour market and skills system is not robustly evidenced, and the assessment fails to demonstrate that sufficient capacity exists to support the Scheme.
- 6.7 The identification of significant beneficial effects on employment and skills is therefore not justified. These conclusions are derived largely from estimates of gross employment generation rather than a realistic assessment of net additional benefit or deliverability. In the absence of robust workforce modelling and labour market analysis, the attribution of Major and Moderate beneficial effects is likely to overstate the socio-economic contribution of the Scheme and does not provide a sound basis for decision-making.
- 6.8 The assessment is further undermined by the absence of secured mitigation and delivery mechanisms. While the ES refers to an Outline Employment, Skills and Supply Chain Strategy, there is no evidence that commitments to local employment, training or skills development are secured through the Development Consent Order or associated requirements. Without a detailed and enforceable strategy aligned to identified labour market needs, the realisation of benefits remains uncertain and cannot be relied upon in the planning balance.

Cumulative effects

- 6.9 The ES concludes that there would be Major and Moderate beneficial cumulative effects on employment, supply chain and skills. However, SCC raised substantive concerns at consultation stage regarding cumulative labour market pressures, including the interaction of East Pye with other NSIPs across Norfolk

and Suffolk. The Council considers that these concerns have not been adequately addressed.

- 6.10 The cumulative assessment relies primarily on the aggregation of employment outputs rather than a demand-led analysis of labour market capacity. While the ES acknowledges overlapping construction phases, it does not undertake scenario testing, workforce modelling or probabilistic assessment of labour supply availability. This is inconsistent with both SCC guidance and EIA best practice.
- 6.11 In particular, the assessment does not meaningfully account for major existing and committed NSIPs already affecting the regional labour market. One such project is Sizewell C, currently under construction in Suffolk, which is not adequately reflected despite generating substantial demand for construction labour and skills provision. This represents a material omission, as major infrastructure schemes draw from a shared and finite regional and national labour pool. Evidence from the Construction Industry Training Board indicates that the construction workforce is highly mobile, with around one in five workers travelling more than 50 miles to site and approximately 28% having worked away from home in the previous year, reflecting the project-based nature of the sector (CITB Workforce Mobility and Skills in the UK Construction Sector 2022). In this context, the failure to incorporate existing demand from Sizewell C materially underestimates cumulative labour market pressures.
- 6.12 The ES fails to assess the consequences of concurrent demand, including competition for skilled labour, displacement between projects, wage inflation and delivery risk. It also does not evaluate the cumulative pressure on the regional skills system, including training providers and education infrastructure, despite identifying skills and the labour market as highly sensitive receptors.
- 6.13 Similarly, the approach to in-combination effects relies on the aggregation of residual effects and the application of professional judgement. This assumes that effects occur independently, when in reality multiple schemes will draw from the same limited workforce. As such, this approach does not provide a robust assessment of indirect or in-combination effects as required by the EIA Regulations.
- 6.14 The geographic scope of the cumulative assessment is also insufficient. SCC previously highlighted the need to reflect cross-boundary labour market dynamics and include Suffolk within detailed modelling, yet this has not been adequately addressed. The absence of a clearly defined functional labour market further undermines the robustness of the assessment.
- 6.15 Finally, the claimed cumulative benefits are not supported by secured mitigation or coordination mechanisms. There is no evidence that employment and skills

initiatives across schemes will be coordinated or aligned and only a limited proportion of employment is likely to be realised locally. This significantly reduces the extent to which benefits can support Suffolk's economy or skills system.

Outline Employment, Skills and Supply Chain Strategy

- 6.16 SCC welcomes the inclusion of an Outline ESSCS and the Applicant's stated intention to secure a detailed strategy through a DCO Requirement. However, consistent with SCC's consultation responses, the Outline ESSCS does not demonstrate that workforce demand, skills needs or delivery mechanisms have been adequately assessed or secured.
- 6.17 The Council's guidance requires a demand-led, effects-based approach focused on workforce and skills requirements. The Outline ESSCS is largely descriptive and does not provide the detailed workforce modelling necessary to inform the assessment of impacts across transport, accommodation, housing and public services. As a result, it does not provide a reliable basis for the Environmental Impact Assessment.
- 6.18 Although headline workforce figures are presented, there is no comprehensive workforce definition by phase, skill level or duration. The temporal distribution of labour demand is not defined, and there is no distinction between key construction roles. This fails to demonstrate how many workers are required, what skills they will have, and for how long. SCC expects a detailed workforce assessment covering workforce numbers, occupations, skills, role durations and the anticipated level of both home-based and non-home-based employment across all project phases, in order to support coordinated labour market planning and assessment of cumulative effects.
- 6.19 The submission also fails to define labour catchments or workforce geographies. There is no distinction between home-based and non-home-based workers, nor any assessment of how labour will be sourced geographically. The absence of defined workforce geographies prevents a meaningful assessment of labour market effects, infrastructure impacts and community interaction. This also limits the ability of SCC, in its role operating the Regional Skills Coordination Function (RSCF), to undertake coordinated workforce planning across Suffolk and manage cumulative labour market pressures.
- 6.20 In addition, the Outline ESSCS does not adopt the required scenario-based approach. SCC guidance requires testing of low, medium and high scenarios of home-based employment to establish a reasonable worst-case. No such scenarios are provided, and there is no quantified estimate of local versus non-local labour. As a result, the application does not provide a robust basis for assessing impacts or identifying mitigation.

- 6.21 In relation to skills and education, the proposed initiatives are not supported by an assessment of training capacity. There is no quantification of training demand or evaluation of whether existing further education and skills provision across Norfolk and Suffolk can respond. This limits confidence that the Scheme can be delivered without exacerbating existing skills shortages. SCC expects a jointly developed education and training strategy, aligned with the RSCF, demonstrating how the Applicant will engage with Further Education (FE), Higher Education (HE) and private providers, support coordinated curriculum planning and deliver inclusive training pathways such as apprenticeships, bootcamps and modular provision.
- 6.22 The Outline ESSCS also does not adequately assess labour market effects, including displacement, competition for labour or cumulative impacts. While workforce mobility is acknowledged, there is no assessment of how the Scheme will interact with existing sectors or other major projects. SCC expects explicit commitment to ongoing information sharing on workforce demand and project timelines, and participation in coordinated workforce planning to manage cumulative pressures across Suffolk's NSIPs and major developments.
- 6.23 Supply chain effects are similarly underdeveloped. Opportunities are identified but not quantified, and there is no assessment of the capacity of local and regional businesses to participate. SCC expects the ESSCS to set out how the Applicant will share supply chain workforce requirements with the RSCF and economic partners, enabling coordinated identification of skills gaps, strengthening of local supply chain capacity and timely engagement of businesses with project opportunities.
- 6.24 Finally, governance and delivery arrangements are not sufficiently defined. There is no clear mechanism for alignment with Suffolk County Council or Regional Skills Coordination Function, nor any commitment to joint monitoring arrangements or agreed performance measures. SCC expects the Applicant to commit to ongoing consultation and engagement, with SCC as a named consultee in the preparation, implementation and monitoring of the detailed ESSCS, including participation in joint governance structures and reporting against agreed employment, training and supply chain outcomes. To facilitate a robust detailed ESSCS as it relates to Suffolk, SCC considers it necessary for SCC to be a named consultee in the discharge of the relevant DCO Requirement on the face of the Order.
- 6.25 While the Outline ESSCS is presented as applying to a wider regional labour market, in practice it is predominantly focused on Norfolk and does not give sufficient consideration to Suffolk as part of an interconnected functional economic area. This is a material limitation given that Suffolk is already subject to substantial demand from existing and consented NSIPs, including Sizewell C

and other major energy infrastructure, which draw from the same finite pool of skilled labour and training provision. The failure to meaningfully incorporate Suffolk within workforce modelling, skills capacity assessment and delivery mechanisms means that the Strategy does not reflect the realities of cross-boundary labour market behaviour or cumulative demand. In the absence of a robust assessment of Suffolk's role within the labour market, and without alignment with Suffolk's education, training and coordination structures, the ESSCS does not demonstrate how adverse cumulative pressures will be managed or how benefits will be realised within Suffolk. This represents a substantive evidential gap which further undermines the reliability of the socio-economic assessment and reduces the weight that can be attributed to the claimed skills and employment benefits in the planning balance.

Tourism

- 6.26 Section 14 of application document Environmental Statement Volume 1: Chapter 14 – Socio-Economics (Revision 1) [APP-050] states that, at peak, there will be an estimated 720 workers, which offers good economic opportunities for the South Norfolk area, with 360 net jobs created. Section 14.8.50 estimates that 120 workers may need to find temporary accommodation in the area during the construction phase. It also estimates that 612 rooms could be available for use during this period. Whilst the area is not a significant tourism hotspot, care must be taken to ensure that there still remains a suitable supply of tourism accommodation for visitors to the area. It would be good to see a plan in place to identify which areas may be best suited to accommodate temporary workers and how the peak will be managed.
- 6.27 There will be very little visual blight resulting from the construction phase and little impact on any local tourism attractions. It would be good to see consideration given as to how the wider Norfolk and East Suffolk/ Waveney Valley tourism economy sector can work with the applicants to ensure that the visitor economy remains buoyant during and after the main construction phase.
- 6.28 Cumulative impacts. As with section 2.7, it would be good to see an acknowledgement of the timing of this scheme and its likely overlap with other NSIPs such as Sizewell C, Ecopower, Sea Link, Norwich to Tilbury etc. Whilst there is some distance geographically from some of these schemes, there is nevertheless the potential for cumulative impacts in the effect on tourism accommodation, traffic etc

7 Highways

Summary

Study Area

- 7.1 [APP-094 (6.2.11.1 Environmental Statement Volume 2: Figure 11.1 Indicative Transport and Access Study Area) shows the indicative study area as along the A140 and the B1332 (north of Bungay). Whilst these roads are in Norfolk, SCC is concerned the scope does not consider the wider network particularly when construction traffic will be concentrated on particular routes such as the A140 and A143. The concerns would be that construction traffic funnelled onto the major roads such as the A140 could have adverse impacts in terms of congestion or road safety.
- 7.2 The A140 is approaching its link capacity in the 2045 Local Plan model run. This does not include the new Babergh / Mid LP growth. Further modelling would be required to assess link capacity in the construction period for this project.

A140 - A14 to Scole

- 7.3 This road runs north/south between the A14 at Needham Market and the A143 roundabout at Scole, on the Norfolk/Suffolk border. The road is a regionally important major route between Ipswich and Norwich with varying speed limits, carrying large numbers of commercial vehicles and commuters. There are limited footways along the length of the A140, with only a narrow footways along mostly the western side of the carriageway and no formal crossing facilities.
- 7.4 In terms of congestion the staggered crossroads with the A1120 in Earl Stonham has been identified as a concern and the Authority is pursuing funding for upgrading as a MRN scheme.
- 7.5 A particular area of concern is the A140 Stoke Ash crossroads, where increases in traffic are causing driver delay on the side arms, making drivers take risks to join / cross the main road risking an increase in the frequency of collisions at this location which is already higher than other junctions on the route. The cumulative impact of workers and/or construction vehicles using this strategic route in combination with increased local traffic and other NSIPs such as EcoPower and Norwich to Tilbury could be severe.

A143 – Bury St Edmunds to Scole

- 7.6 This road runs in a mostly North East / South West trajectory between the town of Bury St. Edmunds and the A140 roundabout at Scole.

- 7.7 It passes through several villages including Great Barton, Stanton and Wortham with intermittent footways on either side of the carriageway, predominantly through the villages. There are very few formal pedestrian crossing points along its length.
- 7.8 The junction of Thurston Road with the A143 has a cluster of collisions (4 serious, 2 slight between 2021 and 2025 inclusive) which is a concern to the SCC and any increase in traffic particularly Heavy Goods Vehicles (HGVs) is of concern.

AIL Routing – Port of Felixstowe to A140

- 7.9 Within the CTMP (APP-201) 6.2.2 it is stated that ‘AIL movements will utilise the Strategic Road Network (SRN) to reach the sites and CRC temporary construction compounds only using the Local Road Network (LRN) for the final part of the journey’. The applicant does not recognise that in terms of access from Felixstowe only the A14 forms part of the SRN with the A12, A140, A143 and A146 are part of the local road network, not SRN. As some of these routes are the responsibility of SCC the authority is concerned about the lack of detail regarding AIL movement (CTMP 6.4.1 and 6.4.2) and that the Applicant has not demonstrated that access is feasible for this project. The *Electronic Service Delivery for Abnormal Loads* (ESDAL) process is binary and likely lead to a rejection if a structure on the route has insufficient capacity for a specific load. SCC would welcome the Applicants contribution towards a more robust process for assessing structures and where necessary remedying any capacity shortfall.
- 7.10 To date no discussions have occurred between the Applicant and SCC regarding suitability of practicality if AILs being routed from Felixstowe. Nor has the applicant confirmed National Highways have accepted Kings Lynn or Felixstowe as being ports that comply with its water borne policy.
- 7.11 There is a bridge at Brockford street on the A140 which requires overbridging for any AILs. Construction of the temporary bridge requires closure of the A140 for 24 hours, disrupting regional and local traffic. The latter typically does not follow approved diversion routes, causing disruption to communities adjacent to the A140. Frequent disruption to the A140 due to AIL movements associated with this and other NSIPs would, in the Council’s view, necessitate investigation and repair of this and potentially other structures.
- 7.12 Any AILs leaving the port of Felixstowe will travel on the A14, which is under the purview of National Highways, up to the junction with the A140. Liaison with National Highways is required with these loads as SCC does not have jurisdiction of the A14 and as such cannot comment on this road.
- 7.13 In terms of resilience SCC would expect that routes to substations from a suitable port will also be considered during the operational phase particularly if

temporary works are used to gain access to these in the construction phase and therefore may not be available after completion of a substation.

Transport and Traffic Conclusion

7.14 In summary, the proposed application will in the construction phase:

- Result in a significant increase in HGV movements on the A140 and A143, particularly when considered in combination with other concurrent NSIPs.
- Increase HGV movements on the A140 and A143, resulting in:
 - Increased delay
 - Reduced residual capacity
 - Reduced attractiveness of the routes for users of sustainable transport, particularly cycling
 - Increased severance in communities along the routes
- Increased wear and deterioration of road and structures due to the additional traffic
- ALL access to the site from Felixstowe may not be feasible due to limitations in the capacity of highway structures.

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