

NORWICH TO TILBURY

EN020027

Comments on the Rule 17 Letter following ISH3/4

Suffolk County Council 

Table of Contents

Glossary of Acronyms.....	2
Purpose of this Submission	2
1 Socio-economics and Tourism	3
2 Matters raised on the ISH4 Agenda.....	9

Glossary of Acronyms

<i>CSEC</i>	<i>Cable Sealing End Compounds</i>
<i>(d)DCO</i>	<i>(draft) Development Consent Order</i>
<i>DESNZ</i>	<i>Department for Energy Security and Net Zero</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ExQ1</i>	<i>Examining Authority's First Written Questions</i>
<i>GAAC</i>	<i>General Aviation Awareness Council</i>
<i>HDD</i>	<i>Horizontal Directional Drilling</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>

"BDC" refers to Babergh District Council; "MSDC" refers to Mid Suffolk District Council; "BMSDC" refers to BDC and MSDC jointly; "SCC" refers to Suffolk County Council; and "the Councils" refers to BDC, MSDC, and SCC jointly.

Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a response to the Rule 17 Letter dated 30 June 2026. The Rule 17 Letter stated a request for further information from the applicant and all local authorities relating to matters deferred from issue specific hearing 3 (draft development consent order) and issue specific hearing 4 (socio-economics). Examination Library references are used throughout to assist readers.

1 Socio-economics and Tourism

a) The ExA asks all local authorities for their comments on the outline ESP [REP5-215], including whether they consider the applicant has adequately addressed the matter of supply chains within the document bearing in mind the number of other Nationally Significant Infrastructure Projects consented in the vicinity of the proposed development. If not, do they suggest any measures the applicant could consider, if any, to address any concerns raised. If not, do they suggest any measures the applicant could consider, if any, to address any concerns raised.

- 1.1 Suffolk County Council welcomes the Applicant's commitment within the Outline Employment and Skills Plan ("OESP") to engage with local authorities and relevant stakeholders in the preparation of a Final Employment and Skills Plan ("ESP"). SCC supports the principle of securing an ESP through the DCO and recognises the importance of early and ongoing engagement in developing an effective and deliverable workforce and skills strategy, particularly in a region experiencing significant demand from multiple overlapping NSIPs.
- 1.2 However, SCC does not consider that the OESP, in its current form, provides a sufficiently robust, integrated or evidence-led framework to demonstrate that the workforce, skills and employment implications of the Project have been fully assessed or can be effectively managed.
- 1.3 However, SCC does not consider that the OESP, in its current form, provides a sufficiently robust, integrated or evidence-led framework to demonstrate that the workforce, skills and employment implications of the Project have been fully assessed or can be effectively managed. While the document provides a useful strategic framework, it does not provide sufficient clarity, structure or certainty regarding how engagement will be undertaken, how local authority input will influence outcomes, or how workforce planning, skills interventions and delivery mechanisms will be coordinated. The commitment to engagement is expressed at a high level and is not supported by a clearly defined governance framework, programme of engagement or mechanism for incorporating local authority input into workforce modelling, skills interventions or delivery planning. As such, it does not yet align with the level of coordination required to manage the scale, complexity and cumulative nature of workforce and skills demand associated with the Project and other major infrastructure schemes in the region.
- 1.4 In line with SCC's Energy and Climate Adaptive Infrastructure Policy and associated supplementary guidance, engagement must extend beyond consultation and form part of a structured and ongoing collaborative approach to workforce planning and skills delivery. This includes working through established mechanisms such as the Regional Skills Coordination Function ("RSCF"), which

provides the strategic framework for aligning labour demand from major infrastructure projects with local skills provision, coordinating interventions and managing cumulative impacts across Suffolk and the wider region. Whilst the OESP references engagement with stakeholders, it does not commit to participation in this established governance structure with sufficient clarity or certainty.

- 1.5 Furthermore, the effectiveness of engagement is dependent on the availability of a robust and phase-specific evidence base. SCC remains concerned that the OESP does not include sufficient workforce data regarding role profiles, workforce numbers, skills requirements and durations. Without this information, stakeholders are unable to provide meaningful input into the scale or type of interventions required, and it is not possible to determine whether the proposed approach is proportionate, deliverable or sufficient to address identified skills gaps and labour market pressures. SCC remains concerned that the absence of this evidence limits the ability to understand the scale and nature of workforce demand arising from the Project and, in turn, restricts the ability to assess the significance of socio-economic effects and determine whether appropriate evidence-led mitigation can be identified and secured at the pre-consent stage, consistent with the expectations of NPS EN-1.
- 1.6 SCC also notes that key elements of the OESP, including specific interventions, workforce-related outputs and delivery arrangements, are largely deferred to the post-consent stage. While the OESP identifies potential mechanisms and future activities, it does not establish a clear linkage between forecast workforce demand and the scale or type of training, employment or business support required. The absence of committed targets, monitoring arrangements and performance measures further limits the ability to secure meaningful outcomes through the proposed DCO Requirement and raises concerns regarding precision, certainty and enforceability.
- 1.7 SCC also remains concerned that the OESP places greater emphasis on maximising opportunities than on identifying and managing potential adverse impacts. In SCC's view, the ESP should function not only as a mechanism for securing benefits, but also as a tool for identifying, assessing and mitigating adverse effects arising from labour demand, including labour displacement, wage inflation and cumulative labour market pressures. Labour demand generated by major infrastructure projects can give rise to both beneficial and adverse effects, particularly when considered cumulatively alongside other NSIPs. The ESP should therefore play a central role in managing those impacts through a coordinated and evidence-led approach.

- 1.8 Overall, while SCC supports the principle of the OESP and the preparation of a Final ESP, SCC considers that the current document does not yet provide sufficient detail, certainty, governance or evidence to demonstrate that workforce, skills and employment impacts have been fully understood or will be effectively managed. SCC therefore considers that the OESP should be strengthened through a clearer governance framework, a defined role for the RSCF, a more robust workforce evidence base, and a clearer demonstration of how engagement will inform the delivery and monitoring of interventions.
- 1.9 SCC recognises that the OESP acknowledges the importance of supply chains and identifies a range of high-level activities intended to support local and regional businesses in accessing opportunities associated with the Project. SCC also notes the Applicant's reference to engagement with Chambers of Commerce, supplier networks and "Meet the Buyer" events, which are recognised mechanisms for promoting supply chain participation.
- 1.10 However, SCC does not consider that the OESP adequately addresses the matter of supply chains, particularly in the context of the scale, complexity and cumulative nature of demand arising from multiple NSIPs across Norfolk, Suffolk and Essex. The OESP adopts a largely generic approach to supply chain engagement and does not provide the level of detail, evidence or strategic coordination required to understand or manage supply chain impacts in a meaningful way.
- 1.11 In line with SCC's Energy and Climate Adaptive Infrastructure Policy and associated supplementary guidance, a robust assessment of supply chain effects should be based on a clear understanding of the goods and services required by the Project, the capacity and capability of businesses within defined geographic areas, and the likelihood of those businesses being able to respond to demand across different phases of construction. The OESP does not provide a sufficiently detailed, phase-specific assessment of supply chain requirements, nor does it establish a scenario-based approach to understanding the probability of local and regional supply chain participation. Consequently, it is not possible to determine the scale of opportunity available to local businesses, the extent of reliance on external suppliers, or the potential impact on existing business capacity.
- 1.12 This is particularly important in the context of cumulative demand. The OESP acknowledges that a number of other NSIPs and major developments are progressing within the Study Area and are likely to require similar construction, engineering, logistics and specialist technical services. However, it does not provide a substantive assessment of how these overlapping demands may affect the availability, capacity or resilience of local and regional supply chains. Nor

does it consider the potential for adverse effects such as market saturation, cost inflation, displacement of existing businesses or constraints on project delivery arising from competition for resources. As a result, SCC does not consider that cumulative supply chain effects have been adequately assessed.

- 1.13 SCC is also concerned that the OESP does not establish how the Applicant intends to coordinate with other project promoters, local authorities, the RSCF or wider regional partners to manage these cumulative pressures. In the absence of such coordination, there is a risk that supply chain opportunities will not be optimised and that local businesses may either be unable to participate due to capacity constraints or adversely affected by competing demand. This is inconsistent with SCC's policy expectation that project promoters work collaboratively to minimise adverse impacts and maximise long-term economic benefits.
- 1.14 As with the workforce and skills elements of the OESP, the definition of specific supply chain interventions and outcomes is largely deferred to the post-consent stage. While the OESP identifies a number of potential activities, it does not establish a clear linkage between forecast supply chain demand and the scale or type of support required to enable local businesses to participate. Nor does it include clearly defined targets, monitoring arrangements or performance measures relating to local or regional supply chain participation. This limits the ability to assess whether the proposed approach is proportionate, deliverable or capable of being effectively secured through the DCO.
- 1.15 SCC further considers that the OESP does not sufficiently recognise the relationship between workforce planning, skills provision and supply chain capacity. Workforce demand, skills provision and supply chain participation should be considered as components of an integrated system rather than separate topics. The ability of local businesses to participate in supply chain opportunities is directly dependent upon access to a suitably skilled workforce, while the success of training and employment interventions depends upon a clear understanding of future supply chain requirements. The OESP does not demonstrate how these relationships have informed the proposed approach, nor how workforce planning, skills development and supply chain participation will be coordinated to support delivery of the Project. The absence of such an integrated approach reduces confidence that either workforce or supply chain outcomes can be delivered effectively.
- 1.16 SCC does not consider that the OESP currently provides a sufficient evidence base, level of detail or framework for coordination to demonstrate that supply chain impacts, particularly cumulative impacts arising from multiple NSIPs, are

adequately understood or managed. SCC therefore considers that the Final ESP should:

- i. provide a detailed, phase-specific assessment of supply chain requirements, including the principal goods and services required and their duration;
- ii. assess the capacity and capability of hyper-local, local and regional supply chains using a scenario-based approach;
- iii. include a quantified assessment of cumulative supply chain demand arising from other NSIPs and major developments, together with associated risks and constraints;
- iv. commit to coordinated working with local authorities, the RSCF and other project promoters to manage cumulative pressures and maximise opportunities;
- v. establish clear targets, monitoring arrangements and performance measures for local and regional supply chain participation capable of being secured through the DCO; and
- vi. demonstrate how workforce planning, skills provision and supply chain development will be coordinated as part of a coherent and integrated delivery framework.

1.17 These enhancements are necessary to ensure that the OESP and subsequent Final ESP function as credible, evidence-led and effective mechanisms for supporting sustainable economic growth, managing cumulative effects and delivering long-term workforce, skills and supply chain benefits across the region.

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b) Views are sought from the applicant, as well as all local authorities, as to whether approval of the submitted document should be secured within the wording of the new requirement (requirement 15) in schedule 3 of the draft DCO [REP5-060] relating to the ESP.

1.19 SCC welcomes the inclusion of Requirement 15 within Schedule 3 of the draft Development Consent Order (“**DCO**”), which provides a mechanism for securing

an Employment and Skills Plan (“**ESP**”). SCC agrees that the principle of requiring a Final ESP prior to commencement is appropriate. However, SCC considers that the current drafting does not provide sufficient certainty, control or enforceability to ensure that the ESP will operate as an effective mechanism for managing the socio-economic impacts of the Project and delivering meaningful skills, employment and supply chain outcomes.

- 1.20 SCC considers that approval of the Final ESP by the relevant local authorities should be secured within the wording of Requirement 15 and that submission of the document alone would not provide a sufficient level of certainty or control.
- 1.21 As currently drafted, Requirement 15 requires submission of the ESP prior to commencement but does not require the document to be approved before works begin. This creates a risk that the ESP may not be adequately scrutinised or agreed and that deficiencies in its evidence base, scope or delivery mechanisms cannot be resolved prior to implementation. In SCC’s view, this significantly weakens the effectiveness of the Requirement as a control. Approval is necessary to ensure that the ESP is consistent with the Outline ESP, incorporates sufficient detail on workforce demand, skills interventions and supply chain measures, and aligns with local and regional governance arrangements, including the Regional Skills Coordination Function (“**RSCF**”).
- 1.22 SCC also has concerns regarding the use of the terms “substantially in accordance with” and “general accordance” within the drafting of the Requirement. These introduce a degree of flexibility which, in the absence of sufficient detail within the Outline ESP, creates uncertainty as to how compliance will be assessed and what level of deviation from the outline document would be acceptable. Given SCC’s existing concerns about the limited level of detail in the Outline ESP, reliance on such broadly framed wording risks allowing further dilution or alteration of commitments at the post-consent stage without any clear mechanism for ensuring equivalence or adequacy. This reduces the degree of certainty that the Requirement can provide.
- 1.23 These concerns are amplified by the substantive issues SCC has identified throughout the Examination regarding the Outline ESP. In particular, SCC remains concerned that there is no clear linkage between forecast workforce and supply chain demand and the interventions required to address it; that key elements, including interventions and outputs, are deferred to the post-consent stage; and that there are no defined targets, monitoring arrangements or performance measures. In this context, the effectiveness of Requirement 15 is critical. However, as currently drafted, the Requirement does not provide sufficient assurance that these matters will be addressed within the Final ESP, nor that the resulting document will be proportionate, deliverable and evidence-led. This, in

turn, raises concerns as to whether the Requirement is sufficiently precise and enforceable, particularly given that the ESP is intended to play a key role in managing socio-economic impacts.

- 1.24 SCC considers that Requirement 15 should be amended to require the ESP to be approved in writing by the relevant local authorities prior to commencement. Approval should be contingent upon the authority being satisfied that the ESP is supported by a robust, phase-specific assessment of workforce and supply chain demand; includes clearly defined interventions aligned to that demand; establishes appropriate governance arrangements, including engagement through the RSCF; and contains clear targets, monitoring and reporting mechanisms. SCC also considers that the wording relating to compliance with the approved ESP should be strengthened and that provision should be made for the review and updating of the ESP, subject to local authority approval, where necessary to respond to changing labour market conditions or cumulative impacts.

2 Matters raised on the ISH4 Agenda

Consultation on community benefit funding. Whilst it is appreciated such benefits are to be delivered outside the development consent process, the ExA would like a clearer understanding of the consultation process, including:

i) *timings for consultation*

- 2.1 SCC understands that the consultation process is imminent.

ii) *methods used for consultation*

- 2.2 The Applicant provided two sessions on week commencing 29 June 2026 to consult with Local Authorities on the proposed approach to consultation.

iii) *how will the applicant decide what is to be included within the community benefit strategy*

- 2.3 SCC maintains its position in regard to community benefits, as stated in Table ID 3.2.11 of the SCC SoCG [REP5-083]. Repeated below for reference.
- 2.4 *“SCC has been clear in its stance that community benefits should be offered for all communities hosting Nationally Significant Infrastructure. Whilst community benefits cannot be considered within the planning balance, this solely means that benefits should be above and beyond any mitigation or compensation embedded within the project. SCC considers that the Government’s March 2025 community benefit guidance provides sufficient clarity on the level of funding expected.*

- 2.5 *SCC has provided National Grid with its preferences and suggestions for Community Funds including potential delivery opportunities. SCC also considers that National Grid should tailor the benefits to the desires of the communities affected. These preferences should be identified via direct consultation with the Town and Parish Councils and analysis of Neighbourhood Plans (where made)."*
- 2.6 SCC considers that the approach taken on NGET's Bramford to Twinstead NSIP (<https://www.nationalgrid.com/sites/default/files/documents/2026-05/Shaping%20your%20Community%20Fund.pdf>) to be an acceptable approach to consultation. SCC understands that recent feedback on community benefits for the Bramford to Twinstead DCO, communities have raised that the fund did not provide sufficient time for applications. The Council would suggest further engagement to avoid this eventuality.
- 2.7 If the Applicant has not already done so, the Council recommends that they review the detailed socio-economic data on parishes held by the Suffolk Observatory, <https://www.suffolkobservatory.info/> and consider this in relation to Suffolk's Hidden Needs <https://www.suffolkcf.org.uk/suffolks-hidden-needs/>