



North Falls Offshore Wind Farm

Non-Statutory Consultation

Suffolk County Council response

9 December 2022

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1 Introduction

These comments of Suffolk County Council (SCC) are in response to the non-statutory consultation held between 17 October 2022 and 9 December 2022.

The scheme consists of a proposed extension to the existing Great Gabbard offshore windfarm, located within the southern North Sea.

The project has the potential for up to 72 turbines across two separate seabed areas. Subject to confirmation, to export the power generated by the windfarm, a grid connection is proposed within Tendring, Essex, in the vicinity of Lawford, with an onshore cable route from a landfall between Frinton-on-Sea and Holland-on-Sea to a new onshore substation, which in turn will connect to a proposed new National Grid substation in the vicinity of Lawford.

The SCC electoral divisions indirectly affected include the following:

- Felixstowe Coastal.
- Felixstowe North and Trimley.
- Wilford.
- Aldeburgh and Leiston.
- Blything.
- Kessingland and Southwold.
- Lowestoft South.

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 the SCC it was not practical for them to be expressed using the format of SSE/RWE's consultation feedback form.

SCC Energy Infrastructure Policy

SCC adopted its Energy Infrastructure Policy in February 2021, setting out its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy is relevant for SCC's position on the North Falls proposals, and states:

"Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero Carbon for the UK. However, 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."¹

SCC will follow this approach in this Representation, and throughout the subsequent DCO process.

SCC continues to be willing to work with SSE/RWE through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

¹ See SCC Energy and Infrastructure Policy:

<https://www.suffolk.gov.uk/assets/suffolk.gov.uk/strategic-electricity-networks/SCC-Energy-Policy-230212.pdf>

Key issues

SCC Holding Objection

SCC recognises the importance of the North Falls proposals as part of the nationally required infrastructure to decarbonise the grid, improve energy supply resilience, and help to meet the challenges of climate change. However, for reasons given below, in relation to the lack of full assessment by National Grid Electricity Transmission (NGET) of an offshore centred approach, as a potential alternative to the proposed East Anglia GREEN project, SCC has no option but to object to this proposal at the present time. In addition to this overarching holding objection, SCC also have objections on specific topic areas (as outlined below) to the proposals as currently formulated.

Offshore Centred Approach

SCC's clear preference is for a coordinated, offshore centred approach, delivered at pace, to minimise onshore infrastructure in Suffolk (or with the potential to have impacts within Suffolk). In its response to the recent East Anglia GREEN non-statutory consultation, of 16th June 2022², SCC considered that, for that project, National Grid Electricity Transmission (NGET) had not presented a comprehensive and conclusive set of evidence that the transmission objectives of that project cannot be met using the alternative of an offshore link or links, with less harmful impacts on the terrestrial environment. If such an offshore solution could be delivered as an alternative, in a timely manner, without risking wider Net Zero, renewable generation (including alternative North Falls connections), and decarbonisation targets, it would be welcomed by the Council and the communities it represents.

The North Falls project is planned to connect to the proposed East Anglia GREEN (EAG) pylon line via a new substation between Ardleigh and Little Bromley, Essex, which will in turn connect to a new EAG substation in the vicinity of Lawford. Given that this grid connection relies on the East Anglia GREEN plans as set out in NGET's non-statutory consultation, it means that if alternative offshore centred solutions to East Anglia GREEN proved feasible, an alternative grid connection strategy for North Falls would likely be required. Whilst SCC notes that the North Falls consultation suggests that, even if an offshore grid connection had been offered, some onshore infrastructure would have been required, the location(s) of any such infrastructure is spatially at large and cannot be (and has not been) assessed.

As SSE/RWE has received a connection offer from National Grid (NGET) for North Falls via East Anglia GREEN, SCC considers it reasonable that at the present time SSE/RWE have not presented evidence or assessment of alternative grid connection proposals, should East Anglia GREEN not be implemented as currently proposed.

However, NGET has recently confirmed that they will be giving further detailed consideration to the opportunities for an offshore alternative to East Anglia GREEN³, therefore it is anticipated that the North Falls grid connection would need to be part of that consideration. This work is likely to also provide any necessary comprehensive evidence on the implications for North Falls of such an alternative.

In the interim, until such work is completed, SCC's position is one of a holding objection, due to lack of assessment of alternatives to East Anglia GREEN by NGET.

The Council notes that SSE/RWE has identified North Falls, jointly with the promoters of Five Estuaries, Nautilus and Eurolink, as being within the Early Opportunities workstream of the

² <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/SCC-Response-to-EAG-Informal-Consultation-16-June.pdf>

³ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/Westminster-Hall-Debate-letter-to-NGET-redacted.pdf>

Offshore Transmission Network Review⁴, and that there are ongoing discussions between these parties and NGET, under the auspices of the Department for Business, Energy and Industrial Strategy (BEIS) and Renewables UK⁵. SCC welcomes this initiative but considers such discussions need to reach conclusions at pace, otherwise the exercise will become nugatory due to decisions made at project level in the interim.

Landscape Impacts and Mitigation Measures for Impacts on the Suffolk Coast and its AONB

The landscape section in Appendix A sets out in detail some of the shortcomings in relation to the assessment of landscape impacts of the North Falls proposals. Whilst the onshore works are proposed to be located in Essex, there is still the potential for there to be visual impacts on Suffolk, in addition to this the visual impacts of the offshore windfarm will be greatest in Suffolk. SCC expects that the impact of the proposals with other offshore wind farms and the potentially resulting cumulative adverse effects, on the Suffolk Coast and Heaths AONB and other Suffolk onshore visual receptors (such as the Suffolk/England Coast Path) are fully explored and assessed. The findings will then need to be presented and explained in a clear and non-technical manner to Suffolk communities, both with written and well-illustrated documents (online and as hard-copies), and through in-person consultation events in Suffolk.

SCC considers that, notwithstanding embedded mitigation and potential modifications to the scheme, there are likely to be unavoidable residual impacts on the community and locality of the Suffolk coast, and the Suffolk Coast and Heaths AONB; including on amenity, loss/reduced quality of recreational opportunity, culture and heritage, and health and wellbeing. SCC expects appropriate and robust mitigation for such residual impacts, which could be, for example, funding for alternative outdoor recreational offers, access and amenity improvements, cultural and heritage enhancements.

Community Benefits and Project Legacy

Secondary mitigation should be in addition to any community benefits from the development, including any arising from emerging requirements in the anticipated consultation on Community Benefits foreshadowed in the British Energy Security Strategy.

SCC encourages the project promoter to consider such community benefit options and would be happy to discuss how community benefit suitable for the locality could be incorporated.

SCC also encourages project promoters to consider legacy opportunities of all elements of their development.

Skills Training Measures

The construction period is predicted to occur during the middle of construction period of the recently consented Sizewell C Nuclear Power Station and the Scottish Power Renewables Hub. It is anticipated that there would be significant cumulative pressure on the available workforce. This could reduce the opportunities to securing any skills and employment legacy from the construction workforces as the projects are now occurring in parallel.

Tourism Mitigation

SCC anticipates that the proposed development, given its location close to the Suffolk Coast & Heaths AONB, Dedham Vale AONB and other rural areas of Suffolk of importance to the tourism economy, could have significant impacts upon visitor perception, and visitor numbers, both during construction and during operation.

⁴ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/2022.07.25-Minister-for-Energy-Clean-Growth-and-Climate-Change-redacted.pdf>

⁵ <https://www.gov.uk/government/publications/offshore-transmission-network-review-pathfinder-projects/joint-statement-from-north-falls-five-estuaries-and-national-grid-commitment-to-exploring-coordinated-network-designs-in-east-england>

Traffic and Transport

SCC expects these impacts to be fully assessed and mitigated, especially as regards to any potential construction traffic impacts on SCC's rural road network and the limited options for suitable HGV and AIL routes once the EAG route alignment has been chosen. Decommissioning/removal also needs careful consideration.

The applicant should also use assessment methods that have been successfully used elsewhere in the region, this would be IEMA GEART rather than DMRB.

Cumulative Impacts

Given the number of infrastructure 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 proposed development in conjunction with those other projects is particularly important.

Other Issues

Further Information Requirements

As expected at this stage of the development of the North Falls proposals a significant amount of background information remains to be presented at the Statutory Consultation stage within the Preliminary Environmental Impact Report. Appendix 1, setting out the responses from internal consultees, highlights in particular where the gaps in knowledge are in respect of the receiving environment and methodological requirements. It is expected that further adjustments to the proposals are likely to be required as greater knowledge is gained of the environmental impacts.

SCC also notes with some concern the difficulty in accessing online the consultation materials. The main text document, providing background information and posing consultation questions, (entitled 'North Falls Offshore Wind Farm Our Consultation') does not appear at all on the Consultation pages of the scheme website but is located only in the documents section of the Newsroom page. Nor is there any obvious sign-posting or navigation guide to the available information on the scheme website. Whilst the Consultation pages present similar information across a range of pages, this is not presented in a format that is easy to download and lacks any summary or contents section. SCC would expect a much clearer and more accessible approach to be adopted in future consultations.

Consultation Period

SCC have repeatedly recommended that any consultation periods last for an eight-week period. This allows for a consistent approach to be adopted and would align the project to that of the East Anglia GREEN proposals, to which this project would connect to the Lawford substation. It is noted that unfortunately the consultation period only extends to seven weeks and four days in this instance. The shortcomings in the presentation of the consultation materials (as referred to above) compound SCC's concerns about giving consultees sufficient time to consider and respond to the consultation.

SCC strongly recommends that any future consultations, including the statutory consultation, should last at least eight weeks.

Appendix A – detailed technical comments

2 Introduction

The full list of technical comments is as follows:

- i) Economic Development
- ii) Highways
- iii) Landscape
- iv) Minerals and Waste Planning Authority

3 Economic Development and Skills

Skills

North Falls Offshore Wind Farm is one of many offshore wind farm projects in consultation or with consent being delivered off the coast of Suffolk. While the onshore construction of the project is proposed to be located in Essex, SCC expects that there will be an impact on the workforce in Suffolk, and that a coordinated approach on skills is desirable.

Local partners, including Suffolk County Council and the New Anglia Local Enterprise Partnership, share a high-level ambition to ensure energy infrastructure development actively support a sustainable regional and national supply chain, with the direct benefit of increased employment, education, and training opportunities for residents.

The County Council are also working to ensure that projects fully and appropriately consider the character, function and sensitivity of the natural and historic environment and landscape of the County and its importance to a thriving tourism sector.

Suffolk and its neighbouring counties have natural geographic advantages, which mean they will play a huge part in achieving the UK's ambition to reach net zero.

Therefore, the cumulative opportunity and negative impacts (such as adverse impacts in the visitor economy, churn, and negative displacement in local employment) of this development must be at the forefront of the applicants thinking, as further details of these projects are developed.

The applicant will be aware that a number of NSIPs have been considered for the local area. Most notably:

The	Sizewell	C	Project:
https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/			

East	Anglia	One	North	Offshore	Windfarm
https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/					

East	Anglia	Two	Offshore	Windfarm
https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/				

A large amount of information and data is available from these projects, and we expect the applicant to demonstrate this has been considered as part of the ES. We would recommend that there is close collaboration between National Grid Ventures (NGV), National Grid Electricity Transmission (NGET), Scottish Power Renewables (SPR), Sizewell C Co. (SZC) and Suffolk County Council.

As an individual project, North Falls offers an opportunity to extend the opportunity for the people and companies involved in the construction of other wind farms. It should also be viewed as one of many projects being delivered in the region and we expect the applicant to deliver a package of training, skills and growth opportunities that engages with the local suppliers, contractors, and the whole supply chain strategically across all local and regional projects.

The project is also likely to be in construction at the same time as the Sizewell C and Scottish Power Renewables Hub are reaching the peak of their construction employment. There is a high likelihood that achieving any home based labour will be extremely difficult as these projects will be well established.

SCC expects the application to take this into consideration when developing a workforce profile and its origins and will need to strongly evidence all their assumptions. The applicant

will need to reflect these findings within all topic areas where workforce origin will have an impact, such as:

- Traffic and Transport.
- Communities.
- Accommodation.

Tourism and Visitor Economy

Whilst onshore works are proposed to be located in Essex, there is still the potential for onshore works to impact Suffolk. The visual impacts of the offshore wind farm is reflected through a permanent impact of tourism on the visitor economy within Suffolk.

Suffolk offers a rich and varied tourist offer known for its heritage assets and landscape designations, such as, the Suffolk Coast and Heath AONB and Heritage Coast. SCC expects the applicant to fully assess and evidence direct and indirect impacts on all known tourism features and designations particularly the extent to which the physical infrastructure will impact and detract from the environmental quality of an area visually and for recreational activity alongside quantifying the impact of construction on tourism assets and visitor numbers. More broadly it is also imperative that the project considers its part in the cumulative impact on the perception and propensity of people to visit the area.

Of particular concern, based on the information provided by the applicant, are the implications for the Suffolk coast as a visitor destination, and the consequences for the local tourism economy. The impacts on the landscape of the Suffolk Coast and Heaths AONB and the related seascape by reason of the potential height and curtaining effects of the offshore elements are discussed in the Landscape comments below. These impacts have the potential to affect the attractiveness of the area to visitors as well as for local communities.

However, in the event that the project is not substantially modified in scale and or spatial extent to reduce these effects, SCC believes it would be reasonable and necessary for the applicant to engage formally with both the relevant local authorities in Suffolk, and the coastal communities they represent, to fully explain the likely effects and to outline proposed schemes of mitigation and compensation, for what appear highly likely to be significant adverse impacts on the coast of Suffolk.

It is noted, whilst the onshore construction area is located in Essex, it is close to the boundary of Suffolk, hence there may be an impact of workers in local accommodation. SCC is seeking to ensure that accommodation of construction workers and other non-home-based workers is of benefit to the visitor economy, and we would like to see any initiatives complementing the tourist season rather than disrupting it. Depending on the timing of the construction work, it could be possible for accommodation to be used in the shoulder months, for example. This could complement the main tourist season (and Autumn/Winter weekend breaks) rather than disrupting it. The potential for using accommodation out of season could be beneficial to the hospitality sector as it seeks to fully recover from the pandemic.

4 Highways

While SCC is not the local highways authority directly affected by this project SCC wish to make the following comments.

For consistency across NSIPs in the areas, SCC considers it is reasonable to request that the applicant uses assessment methods that have been used successfully elsewhere in the region (based on IEMA's Guidelines for the Environmental Assessment of Road Traffic (GEART) rather than the Design Manual for Roads & Bridges (DMRB) although SCC would defer to Essex County Council if they have a preferred methodology.

5 Landscape and Seascape

Whilst the onshore works are proposed to be located in Essex, there is still potential for these to impact Suffolk, and the visual impacts of the offshore windfarm will be greatest in Suffolk.

Based on the information provided by the applicant and the reasonable worst case currently proposed (and illustrated in the photospheres) of up to 397m high turbines, it appears that the northern sector of this project will be highly visually prominent on the Suffolk coast, and is likely to have significant adverse impacts on visual receptors in Suffolk. It appears likely to have a significant adverse impact on the Suffolk Coast and Heaths AONB. As anticipated in [*Suffolk Seascape sensitivity to offshore wind farms*](#) [White Associates October 2020]

<https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/Suffolk-seascape-sensitivity-to-wind-farms-final-061020-003.pdf>

It also appears that the southern part of the project will extend the curtaining effect of turbines on the southern horizon.

It is noted that the current consultation is focused on Essex as regards the onshore aspects of this proposal but it is important to recognise that the offshore elements will impact on a wider stretch of the coastal environment, regardless of the location of the onshore infrastructure. SCC considers that there is a significant risk that the project (including the offshore elements), as currently presented, is likely to have such impact as to undermine the purposes of the designation of the Suffolk Coast & Heaths AONB. Suffolk County Council recognises that this is primarily a matter for Natural England, who are required to advise any future examination, and ultimately the Secretary of State, on the impacts of this project on the AONB and the purposes of its designation. Nonetheless, Suffolk County Council also has its own responsibilities in relation to the AONB by virtue of the duties imposed by the Countryside and Rights of Way Act 2000.

SCC notes the comments of the Planning Inspectorate in the scoping for this project (p89) as follows:

“The Scoping Report states that impacts on designated landscapes (Suffolk Coast and Heaths AONB and Heritage Coast) from onshore infrastructure are unlikely to be significant due to the distance from the AONB and their localised nature, and are proposed to be scoped out, although this will be confirmed once the substation site is known and through analysis of distance and potential visibility. At this stage, the Inspectorate does not have sufficient information about the location and design of the onshore infrastructure to conclude that it would not give rise to likely significant effects on designated landscapes (Suffolk Coast and Heaths AONB and Heritage Coast, and potentially Dedham Vale AONB, which is located on the north west boundary of the scoping area) and therefore this should not be scoped out of the ES.”

Given the impact of onshore infrastructure on the AONBs remain in scope, it is suggested that the applicant will also have to consider this matter in relation to cumulative impacts with other proposed onshore infrastructure, not only the Five Estuaries project and East Anglia GREEN, but the applicant should note that a new proposal for a 1.4 GW DC converter station to facilitate an interconnector with Germany (known as Tarchoj) is being proposed for a connected licence from Ofgem, to the same location where the applicants own connection point in Essex is currently being proposed. According to the licence application the proposed location is [51°55'21.5"N 1°00'59.9"E](#)

<https://www.ofgem.gov.uk/sites/default/files/2022-11/Tarchon%20Energy%20Ltd%20-%20Notice%20of%20application%20for%20an%20Electricity%20Interconnector%20licence.pdf>

Details of the proposed project are available from the European Network of Transmission System Operators for Electricity [ENTSO-E in their Ten Year Network](#) Development Plan and

are set out at <https://tyndp2022-project-platform.azurewebsites.net/projectsheets/transmission/1050> for a 1400MW DC Bipole VSC interconnector.

In the event that the project is not substantially modified in scale and or spatial extent to reduce these effects, SCC believes it would be reasonable and necessary for the applicant to engage formally with both the relevant local authorities in Suffolk, and the coastal communities they represent, to fully explain the likely effect and to outline proposed schemes of mitigation and compensation, for what appear highly likely to be significant adverse impacts on the coast of Suffolk.

6 Minerals and Waste Planning Authority

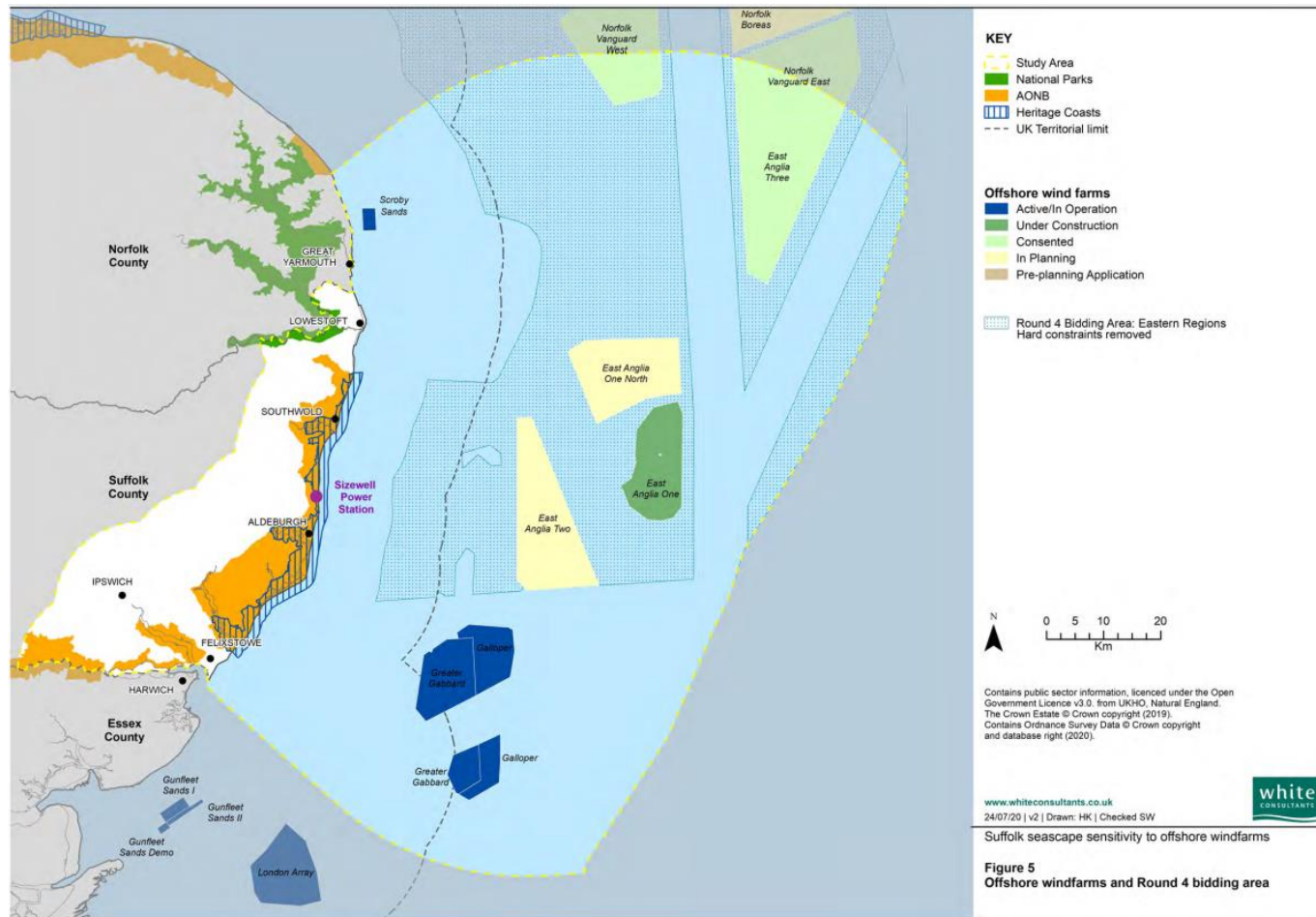
At the present time there are no known significant minerals or waste planning implications of the proposals within Suffolk at the present time.

Table 1: Adopted Development Plans

Item	Area	Subject	Comment
1	Suffolk	Suffolk Minerals & Waste Local Plan https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/	Adopted July 2020

Maps

Map 1: An Extract from Suffolk Seascape Sensitivity to Offshore Windfarms - October 2020 - White Associates - for SCC & the SCHAONB Partnership⁶



⁶ <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/Suffolk-seascape-sensitivity-to-wind-farms-final-061020-003.pdf>