



North Falls Offshore Wind Farm

Statutory Consultation

Suffolk County Council response

14 July 2023

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1. Introduction

1.1 These comments of Suffolk County Council (SCC) are in response to the Statutory Consultation stage including the 'Preliminary Environmental Information Report' (the PEIR) by North Falls Offshore Wind Farm team dated May 2023.

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

1.3 The project has the potential for up to 72 turbines across two separate seabed areas with a maximum tip height of 397 metres above mean high water springs.

1.4 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.
- Gunton.
- Pakefield.

1.5 This representation raises the following substantive issues in detail below:

- a) The Council's preference for a coordinated offshore centred approach.
- b) The need for seascape and landscape impacts and mitigation in respect of the Suffolk coast and its Areas of Outstanding Natural Beauty.
- c) The need for the promotor to consider community benefit and project legacy.
- d) Socio-economic impacts of the scheme and seeking further commitments to support local skills training measures.
- e) Impacts on tourism.
- f) The need to assess traffic and transport impacts, including upon Suffolk's transport system.
- g) A full assessment of cumulative impacts with other schemes.
- h) The level of consultation with communities in Suffolk by the promotor.

2. National Policy

- 2.1 The County Council acknowledges the need to increase renewable energy generation, the increasing demand for new additional generation and the UK Government's legal obligation to achieve Net Zero Emissions by 2050, as supported by research and publications by the Committee for Climate Change.
- 2.2 National Policy Statement (EN-1) is the overarching national policy statement for energy and was published in July 2011. 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.
- 2.3 National Policy Statement (EN-3) is the UK Government's strategy for renewable energy infrastructure. This statement states that, through the Offshore Energy Strategic Environmental Assessment 2009 (SEA) process, the Government has concluded that there are no overriding environmental considerations to prevent the achievement of the planned 25GW capacity. However, this is subject to mitigation measures being implemented to prevent, reduce and offset significant adverse effects. This figure has now been increased to 50GW by 2030.
- 2.4 National Policy Statement (EN-5) is the UK Government's strategy for electricity network infrastructure. This policy statement applies to transmission systems and associated infrastructure (e.g. substations) and sets out the general principles that should be applied in the assessment of an application for development consent. The County Council expects the promoter to use this policy statement effectively to influence their site selection for their onshore substation in Essex.
- 2.5 The Government consulted on changes to the suite of Energy National Policy Statements in 2021 (including revised versions on EN-1, EN-3 and EN-5) and between 30 March and 25 May 2023. The revised versions of this policy guidance may be published later this year, before any NSIP application has been submitted. If so, the new guidance will need to be considered during the examination process. However, for the time being, the existing policy framework remains in place.

3. SCC Energy Infrastructure Policy

- 3.1 The 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.
- 3.2 The County Council updated its energy infrastructure policy on 16 May 2023, setting out its overall stance on projects required 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.

- 3.3 The policy also sets out how, in principle, the County Council will engage and influence other parties to ensure adverse impacts to our communities are understood and addressed by future decisions.
- 3.4 The County Council expects to have comprehensive and effective engagement with developers and their supply chain partners to maximise the local business opportunity, skills inspiration, and employment benefits. Where appropriate, the County Council and developers should promote synergies between projects that enhance these benefits, deliver growth, and attract inward investment.
- 3.5 The County Council will expect projects to deliver appropriate community benefit schemes in addition to the necessary compensation and mitigation, including schemes that support the decarbonisation of heat and transport, reduce energy poverty, and improve the climate adaptive resilience of both the natural environment and communities.

4. Coordinated Offshore Centred Approach

- 4.1 The 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.
- 4.2 The County Council does note that the promotor has identified this project, jointly with the promoters of Five Estuaries, Nautilus and Eurolink, as being within the Early Opportunities workstream of the Offshore Transmission Network Review, and that there are ongoing discussions between these parties and National Grid Electricity Transmission (NGET), under the auspices of the Department for Energy Security and Net Zero.
- 4.3 The County Council considers that the developers of these projects, and East Anglia Green, have not presented a comprehensive and conclusive set of evidence that the transmission objectives of these project cannot be met by combining these offshore wind farms into the multi-purpose interconnectors, to reduce the impact of onshore infrastructure on the terrestrial environment in Essex or Suffolk. If such an offshore solution which could be delivered, in a timely manner, without risking wider Net Zero renewable generation and decarbonisation targets, it would be welcomed by the County Council.
- 4.4 The County Council has separately made objections to NGET's East Anglia Green project on this basis that it does not adequately demonstrate why greater offshore co-ordination would not be feasible to avoid or significantly reduce the need for that project. As noted above, this proposal is reliant upon the Lawford substation, which is part of the East Anglia Green project, for its own connection to the National Grid network. Whilst onshore development to deliver that connection falls in Essex rather than in Suffolk, the socio-economic and highway impacts of that inshore development are more widely spread and will also affect the local road network and communities and businesses in Suffolk. To that extent, the County Council also has concerns about this project's reliance on an onshore connection and on a component part of the East Anglia Green project.

5. Landscape, Seascape and the AONB

- 5.1 Given the need for accurate assessment of direct and cumulative impacts, the County Council's view is that the preliminary position of the promoter has not adequately addressed the potential harm on the Suffolk Coast & Heaths Area of Outstanding Natural Beauty.
- 5.2 The County Council, jointly with East Suffolk Council and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty Partnership, commissioned White Associates to provide an update to the Seascape Sensitivity Study originally commissioned in 2020. The original sensitivity study does not take into account the parameters (larger turbines etc.) of the North Falls project (see Map 1 appended).
- 5.3 The County Council will provide the developer with a copy of this addendum as soon as work is completed. However, early indications show that the conclusions of the report will be different to that of the opinion provided by the developer.
- 5.4 Taking this into account, it appears that the north-eastern most portion of the project will have significant impacts on the Suffolk Coast and Heaths AONB. These impacts could be eliminated by this small part of the project being removed.
- 5.5 The removal of this part would only lead to a reduction in seven turbines.

6. Community Benefit and Project Legacy

- 6.1 Community benefits should be in addition to the required secondary mitigation for the development, including those based on any emerging requirement in the Government's recent consultation on Community Benefits, which the County Council has responded to.
- 6.2 The County Council encourages the promoter to consider such community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Given the visual impacts on the Suffolk coast, community benefit must be considered for those affected communities.

7. Socio-Economics and Skills

- 7.1 Whilst the onshore construction of the project is proposed to be located in Essex, the County Council expects that there will be an impact on the workforce in Suffolk, therefore a coordinated approach on skills is required.
- 7.2 Local partners, including the County Council and the New Anglia Local Enterprise Partnership, share a high-level ambition to ensure energy infrastructure development actively supports a sustainable regional and subregional supply chain, with direct benefits of increased employment, education and training opportunities for residents.
- 7.3 Suffolk and its neighbouring counties have a natural geographical advantage, which means that they will play a huge part in achieving the target 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 promoters thinking, as further details of the project are finalised.

- 7.4 The County Council expects the promoters to deliver a package of training, skills and growth opportunities that engages with local suppliers, contractors, and the whole supply chain strategically across all local and regional projects.
- 7.5 It is anticipated that this project has the potential to be in construction (subject to consent being granted) at the same time as Sizewell C Nuclear Power Station and the Scottish Power Renewables Hub are reaching the peak of their construction employment. Therefore, the promotor could be in a position in which they may find it difficult to secure any home-based labour as these projects will be already well established.
- 7.6 The County Council expects this to be taken into account when developing a workforce profile, including origins, and the promoter will require strong evidence to accompany their assumptions.
- 7.7 The County Council welcomes the proposal for a dedicated outline skills and employment plan as part of the promoter's development consent order application and will require this plan to take a strategic approach to enhance the impact of ongoing activities within the County and the maximise the benefits of the plan.
- 7.8 The promoter has assumed that non-local workers will be unlikely to bring additional family members to the local area, the County Council would welcome further clarification of the basis of this assumption.

8. Tourism

- 8.1 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 elements are reflected through a permanent impact upon tourism on the visitor economy within Suffolk.
- 8.2 The County Council believes that it is vital that projects fully and appropriately consider the character, function and sensitivity of the natural and historic environment and landscape of Suffolk and its importance to a thriving tourism sector.
- 8.3 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. The County Council expects the applicant to fully assess and evidence direct and indirect impacts on designations. This includes the extent to which the physical infrastructure would detract from the environmental quality for recreation and 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.

- 8.4 Of particular concern 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 of the offshore elements are already discussed in the Seascape and Landscape section. These impacts have the potential to affect the attractiveness of the area to visitors as well as for local communities.
- 8.5 The County Council is also seeking to ensure that addressing the accommodation needs of construction workers and other non-home-based workers is not detrimental but beneficial to the visitor economy. This could be achieved by aiming for the project related accommodation needs to be complementing the main tourist season (and Autumn/Winter weekend breaks) rather than causing disruption. For example, depending on the timing of the construction work, it could be possible for accommodation to be used in the shoulder months.

9. Traffic and Transport

- 9.1 The County Council expects traffic and transport impacts to be fully assessed and mitigated, for Suffolk especially in regard to any potential construction traffic impacts on Suffolk's rural road network and the limited options for suitable HGV and Abnormal Intervisible Loads (AIL) routes once the East Anglia Green route alignment has been chosen.
- 9.2 The County Council will need to be satisfied that there will be no disruption or delays cause by the project on the A12 or wider strategic right network which may then have an impact on businesses in Suffolk.
- 9.3 There should be an Outline Port Construction Management Plan provided to manage traffic impacts that arise at any port as a result of the offshore elements of the proposal.
- 9.4 Decommissioning and removal routes also need careful consideration.

10. Cumulative Impacts

- 10.1 Given the number (approximately five NSIPs reaching statutory consultation stage in 2023/24, with many more at different stages of the process) 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.
- 10.2 There is a lack of reference to the potential impact on businesses and supply chains of other construction projects in the local area and region due to additional workforce displacement and churn resulting from the project.
- 10.3 The County Council welcomes the commitment from the promoter to undertake an assessment of whether it is considered likely that the cumulative effect indicates a loss of benefit as a result of cumulative projects, or an enhancement of opportunity which would help to develop expertise and capacity in the market.

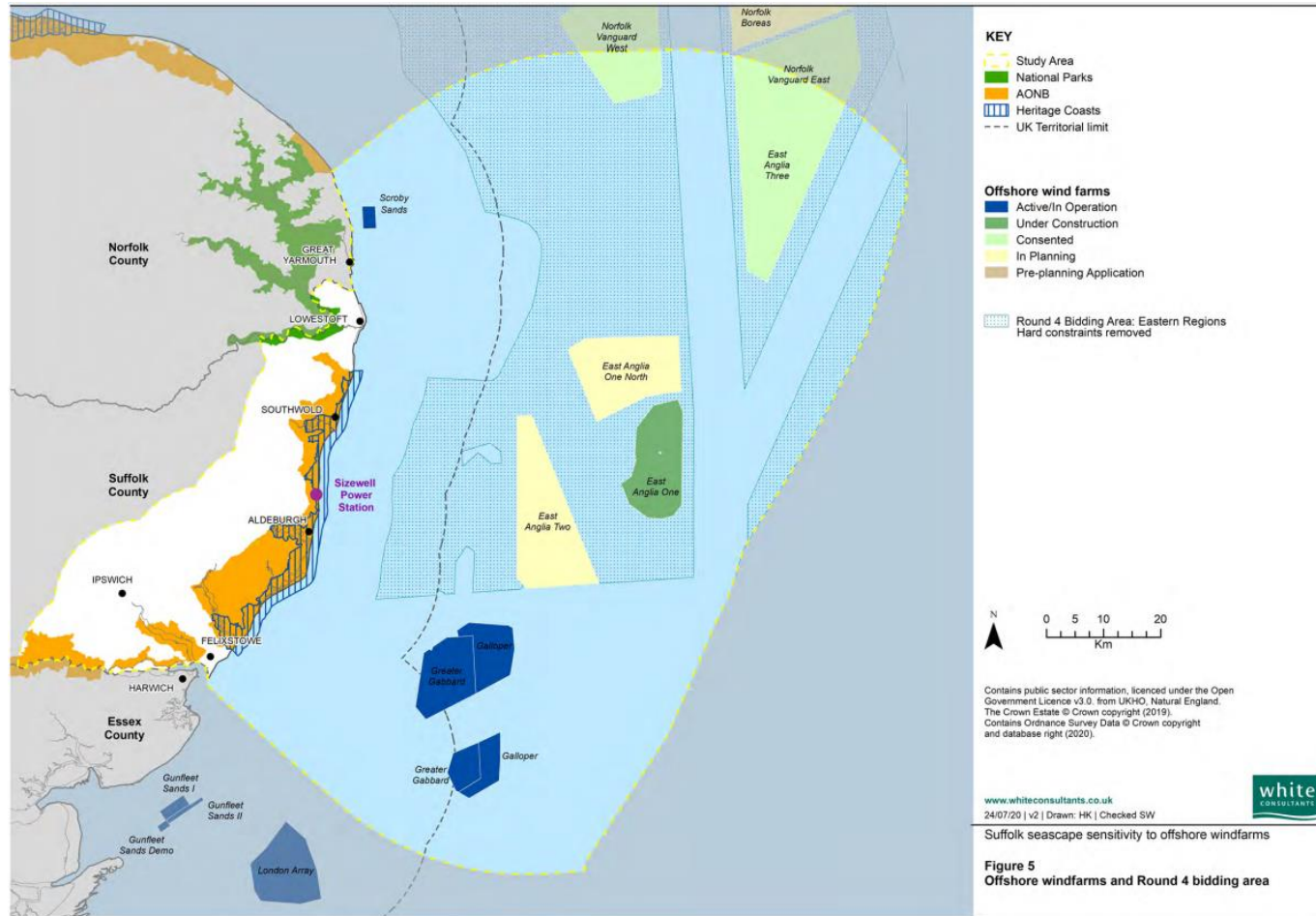
- 10.4 The above assessment should include a consideration of other infrastructure projects not just similar offshore wind farm projects and identify how any mismatch between supply and demand can be addressed. This cumulative effect assessment would also need to be considered in determining the feasibility and consequential impact of securing a greater contingent of local work force and if the number of workers needed from beyond the boundaries of the workforce supply chain area (both positive and negative, including a consideration of displacement and high levels of labour churn in the wider economy).
- 10.5 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 to securing any skills and employment legacy from the construction workforces as the projects could be occurring in parallel.
- 10.6 The County Council expects the promotor to develop a demonstrable understanding of the wider development environment for their project, and to work with the County Council and other promoters to manage and mitigate these impacts.

11. Consultation undertaken by the promotor

- 11.1 The County Council will be consulted on the adequacy of the promoters consultation by the examining authority once the application for development consent has been submitted.
- 11.2 The closest offshore elements are located off the coast of Suffolk; therefore it is expected that the promoter engages effectively with communities and stakeholders within Suffolk.
- 11.3 The developer has not undertaken in person consultation events in Suffolk, even though its sister project (Five Estuaries), which is approximately double the distance offshore (approx. 40km) conducted these in various locations along the Suffolk coast from Felixstowe to Lowestoft.
- 11.4 When the examination authority consults the County Council on the adequacy of consultation, the County Council will have to assess whether the promoter has undertaken the correct level of consultations, including with rural coastal communities and other hard to reach groups within Suffolk.

Maps

Map 1: An Extract from Suffolk Seascape Sensitivity to Offshore Windfarms - October 2020 - White Associates - for SCC & the SCHAONB Partnership¹



¹ <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/Suffolk-seascape-sensitivity-to-wind-farms-final-061020-003.pdf>