

Date: 17 October 2024

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BY EMAIL

For the attention of the Case Team

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Dear Case Team,

NORTH FALLS OFFSHORE WIND FARM DCO APPLICATION (EN010119)
SCC RELEVANT REPRESENTATIONS

Thank you for the notification that the Planning Inspectorate has accepted the above application and that interested parties have until 18 October 2024 to submit Relevant Representations. Please therefore accept this letter as a response from Suffolk County Council ("SCC") to the Planning Inspectorate's request.

SCC notes the recent changes to the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015, which mean that Relevant Representations are now required to be "where practicable, the full particulars of the case". Because SCC expects to be invited to submit a Local Impact Report ("LIR") in due course, it should be noted that full technical details of SCC's case will necessarily follow in the LIR.

Notwithstanding the above caveat these Relevant Representations set out, as fully as is practicable, SCC's case in the following paragraphs:

Offshore Centred Approach

1. SCC 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.
2. SCC has separately made objections to NGET's Norwich to Tilbury project on the 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 Norwich to Tilbury 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 business in Suffolk. To that extent, SCC also have concerns about this project's reliance on an onshore connection and on a component part of the Norwich to Tilbury project.

Landscape and the National Landscape Area

3. At the previous statutory consultation stage, SCC believed that the promoter may not have adequately addressed the potential harm on the Suffolk Coast & Heaths National Landscape.
4. As part of our previous representations, SCC commissioned White Consultants to provide an update addendum to their 2020 report into Suffolk Seascape Sensitivity Study to Offshore Wind Farms.
5. The original 2020 study had not taken into account the parameters of the North Falls project, because at the time offshore wind farms were smaller in height than is currently common. Subsequently the update addendum was published in June 2023. Both the 2020 study and the 2023 addendum will be appended to SCC's Local Impact Report (LIR).
6. In general, larger wind turbines both in terms of overall height and diameter of tower and swept path have a larger magnitude than smaller wind turbines at the same distance. Therefore, larger buffers for larger turbines are reasonable.
7. The percentage of time that visibility of turbines is possible over long distances and the aspect of the east coast both increase the likelihood of visibility of turbines beyond 40km.
8. Turbines over 400m high should be at least 40km away from the coast and preferably more as set out in the buffers in 4.17 of the update addendum. If the nearest wind turbines of any given array are around 40km away from the national landscape coast, it is highly desirable for the number around this distance to be minimised in order to avoid significant adverse effects on the national landscape and curtaining effects on the skyline in excellent visible conditions.
9. In light of this assessment, the project's maximum turbine height of 377m at a distance of 40km from the coast means that SCC finds that there is not likely to be a significant effect on seascape and landscape or the Suffolk Coast and Heaths National Landscape Area.
10. SCC will remain engaged in landscape and seascape to ensure that the values of the Suffolk Coast and Heaths National Landscape are considered and taken into account.

Community Benefit and Project Legacy

11. Community benefits should be in addition to the required secondary mitigation for the development, including those based on any emerging requirements in the anticipated consultation on Community Benefits foreshadowed in the British Energy Security Strategy, which is expected to be consulted on imminently.
12. SCC encourages the promoter to consider such community benefit options and would be happy to discuss how community benefit suitable for the locality could be incorporated. It considers that, given the visual impacts on the Suffolk coast, an element of community benefit should be considered for those communities affected.
13. SCC also encourages the promoter to consider legacy opportunities of all elements of their development.

Socio-Economic and Skills

14. The Applicant's socio-economic assessment is weakened by not considering several key documents and sources of data. These include the Economic Strategy for Norfolk and Suffolk, the Technical Legacy Report for Norfolk and Suffolk along with SCC's Energy Infrastructure Policy.
15. SCC cannot fully determine the sufficiency of the approach to determining socio-economic impact ahead of the levels of expected employment, and the detailed workings supporting it, being provided and assessed by the promoter. We consider further work to be required by the promoter, including clearly setting out the expected number and nature of employment opportunities during each phase of the project. These employment opportunities need to be related to the expected availability of labour in the area.
16. The promoter's commitment to prepare and implement an Employment, Skills and Education Strategy is welcomed and SCC would be willing to work with the promoter to ensure that there is alignment between the strategy and ongoing local activity supporting education, skills and employment to ensure that the strategy can have as great an impact as possible. This would be in line with SCC's energy infrastructure policy which requires promoters to

undertake comprehensive and effective engagement with SCC and supply chain partners to maximise the local business opportunity, skills inspiration and employment benefits.

Tourism

17. SCC anticipates that the project, given its location close to the Suffolk Coast & Heaths National Landscape Area and Dedham Vale National Landscape Area and other rural areas of Suffolk of importance to the tourism economy, could have residual impacts upon visitor perception, and visitor numbers, both during construction and during operation, which, in particular in combination with other projects happening simultaneously in the area, could be significant.

Traffic and Transport

18. SCC 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 Indivisible Loads (AIL) routes once the Norwich to Tilbury route alignment has been chosen.
19. If any AILs originate from ports in Suffolk, SCC would need to be consulted at an early stage to identify impacts and any consequent works to facilitate or mitigate these movements.
20. SCC will need to be satisfied that there will be no disruption or delays caused by the project on the A12 or wider strategic road network which may then have an impact on individuals and businesses in Suffolk.
21. 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. SCC can supply examples of similar documents which have been successfully used for consented offshore wind farms in Suffolk. At outline stage, these documents do not limit the Applicant's flexibility to choose a suitable port. Instead, they provide a commitment to implement a framework of controls which can be tailored to suit the project's operational requirements.
22. Decommissioning and removal routes also need careful consideration, whether at consenting stage or through a robust post-consent approvals process.
23. SCC may make further specific comments on HGV movements to the proposed ecological compensation site at Orford Ness, about which officers are currently engaging with the promoter.

Cumulative Impacts

24. Given the number (approximately 5 NSIPs reaching statutory consultation stage in 2023/24) of Nationally Significant Infrastructure Projects and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with the other projects is particularly important.
25. 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.
26. SCC 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'.
27. The above assessment should include consideration of other infrastructure projects, not just 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 lowering the number of workers needed from beyond the boundaries of the WSA (both positive and negative, including a consideration of displacement and high levels of labour churn in the wider economy).
28. The construction period for this project is predicted to occur during the middle of the construction period for Sizewell C Nuclear Power Station. It is anticipated that there would be significant cumulative pressure on the available workforce. This could reduce the

opportunities for securing any skills and employment legacy from the construction workforces as the projects would be occurring in parallel.

29. SCC expects the promoter to develop a demonstrable understanding of the wider development environment for their project, and to work with SCC and other promoters to manage and mitigate these impacts.

Yours faithfully,

[Redacted Signature]

[Redacted Title]

[Redacted Name]

Growth, Highways & Infrastructure
Suffolk County Council