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Date: 6 July 2023
Our Ref: North Falls Statutory Consultation Response
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FAO: Daniel Harper – Consent Manager

Re: East Suffolk Council's response to the third round of consultation for the North Falls Offshore Wind Farm Project – Statutory Consultation (16 May – 14 July 2023).

Thank you for your letter dated 16 May 2023 inviting East Suffolk Council (ESC) to provide feedback on the third round of consultation for the North Falls offshore wind farm project. The statutory consultation is being held between 16 May and 14 July 2023, with ESC being identified as a consultee for the purposes of Section 42 of the Planning Act 2008 and/or Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This letter provides ESC's response to the statutory consultation.

Having reviewed the published statutory consultation materials, ESC understands that the current proposal is for either 72 offshore wind turbines (310m to blade tip) or 40 offshore wind turbines (397m to blade tip) split across two offshore array areas, with two offshore substation platforms, located approximately 22.5km off the Suffolk coast at the closest point. We understand the subsea cable route will make landfall between Frinton-on-Sea and Holland-on-Sea in Tendring, Essex. We also understand from the previous round of non-statutory consultation that National Grid has made a grid connection offer for the project, which assuming this continues to be a radial connection, is likely to be on the Tendring Peninsula in proximity to the proposed Norwich to Tilbury (formerly East Anglia Green) project's connection substation south of Lawford.

However, it is noted that the North Falls project is maintaining a flexible approach to connection options in the Development Consent Order (DCO), presenting three options for the transmission infrastructure. It is understood that the first option being proposed provides approximately 24km of underground cables (for this project alone) linking to a new onshore substation co-located with the Norwich to Tilbury project's substation at Lawford in Tendring. The second option being the same as the first option, apart from the sharing of all or part of the onshore cable route infrastructure with separate onshore export cables (potentially with the Five Estuaries offshore wind farm project where practicable), and the third option being an offshore electrical connection supplied by a third-party electricity network provider. The latter option being potentially identified through the Offshore Transmission Network Review (OTNR) process.

As set out in our previous engagement at the non-statutory consultation, ESC's primary concern with the North Falls project relates to the potential for seascape visual impacts being introduced on our highly designated coastline and communities, including the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). In June 2020, Suffolk County Council (SCC) and Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Partnership (in consultation with ESC and Natural England (NE)) commissioned a

seascape sensitivity study for offshore wind farms located in the inshore and offshore waters off the Suffolk coast (Suffolk Seascape Sensitivity Study, White Associates 2020).

The seascape of Suffolk is sensitive to offshore wind farm development primarily due to its relationship with the combined Suffolk Coast and Heaths AONB and Suffolk Heritage Coast, with seascape contributing significantly to the AONB's setting and natural beauty. To fully assess the potential seascape impacts on East Suffolk's coastal communities and designated landscapes, an update to the Suffolk Seascape Sensitivity Study 2020 was required as the original scope of works did not cater for the proposed North Falls project parameters having wind turbine generators up to 397m to blade tip. The findings of this updated study have now been published and inform our response to the statutory consultation set out below. Whilst this update was commissioned to support ESC's recent response to the Five Estuaries statutory consultation, having proposed wind turbines up to 424m to tip at approximately 37km from the Suffolk coast, its findings are equally applicable to the North Falls project, which proposes wind turbines up to 397m to tip at only 22.5km from the Suffolk coast. The Suffolk Seascape Sensitivity to Offshore Wind Farms Study update addendum - White Consultants (June 2023) is attached to this letter in Annex A.

ESC is not a host authority, or a direct neighbouring authority of the onshore scoping area. However, whilst no onshore infrastructure is proposed within our District, ESC has concerns regarding the potential significance of visual impact on our coastal regions resulting from the project. At a distance of approximately 22.5km from the northern offshore array, the proposed wind turbines will be visible from the designated Suffolk Coast and Heaths AONB, and this response provides comments primarily relating to potential seascape, landscape and visual impacts and their anticipated significance.

Our response is provided on the basis that the North Falls Offshore Wind Farm proposes an onshore grid connection located outside of Suffolk and beyond the ESC District, however, should this change in future, our position on this project may need to be revisited. ESC therefore requests that should there be any amendments to the onshore (or offshore) connection location for the project, the Council is informed. This letter provides you with ESC's feedback on the current proposals set out in the Preliminary Environmental Information Report (PEIR) consultation materials. This letter should be read in conjunction with our response submitted to PINS for the EIA Scoping Report consultation (16 August 2021)[1], and our previous non-statutory consultation responses (6 December 2021; 2 December 2022)[2].

Need case and coordination

ESC acknowledges that renewable energy will play a central role in tackling climate change and in meeting Government targets in the lead up to net-zero by 2050. A significant amount of new offshore wind generation and associated infrastructure is required to connect 50GW by 2030. However, the shift towards the delivery of low carbon and renewable sources of energy must consider the potential impacts it may have on the landscape, natural environment and local communities set to host or neighbour such development. Developers must also explore opportunities for greater levels of coordination between projects in relation to the objectives set out in the OTNR.

ESC supports North Falls' submission into the Government's Offshore Coordination Support Scheme (OCSS), noting that this seeks to provide grants to offshore energy projects to develop coordinated options for offshore transmission infrastructure. North Falls is also engaging with the OTNR as is the developer of the Five Estuaries project, and whilst it is welcomed that the North Falls project, alongside other developers, has

[1] https://www.eastsuffolk.gov.uk/assets/Planning/Strategic-engagement/1-ESC-North-Falls-Scoping-Report-Response-160821.pdf
[2] https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/North-Falls/ESC-response-to-North-Falls-Offshore-Wind-Farm-informal-consultation-Dec21.pdf; https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/North-Falls/ESC-response-to-North-Falls-Offshore-Wind-Farm-Informal-Consultation-Dec22.pdf

committed to exploring options within the Early Opportunities workstream[3], ESC remains disappointed that the project has not been put forward as a Pathfinder. Every opportunity should be undertaken by the two developers, given it is likely that they will have the same connection location, to seek maximum coordination between the projects in order to minimise impacts on local communities and the environment. The Sheringham Shoal and Dudgeon extension projects located in Norfolk are demonstrating that greater coordination is possible, and this should be replicated. ESC would welcome the opportunity to engage in future pathfinder discussions should these options be pursued within East Suffolk.

ESC welcomes the intention for coordination between the North Falls and Five Estuaries offshore wind farm projects, noting that an opportunity to coordinate more closely has been identified by the developers. We understand that coordination will seek to reduce the potential impact of building the onshore connection to the national electricity transmission network for the two projects, however, note that the viability of any coordinated connection is dependent on the progress made by the OTNR process, associated regulatory and commercial policy changes and the individual offshore connector projects involved.

Whilst the proposed onshore connections for both North Falls and Five Estuaries projects are not within the East Suffolk District, offshore options for connection should continue to be fully explored, minimising the need for onshore infrastructure. It is therefore encouraging to see the intention of this project's DCO to include a third option for connection as stated earlier (an offshore electrical connection supplied by a third-party electricity network provider), which will be for the Secretary of State to decide which is to be pursued as part of the DCO decision making process at the appropriate time.

ESC supports the proposed coordination effort between the two projects regarding key elements such as cable corridor selection (to optimise both onshore routes), environmental surveys and by sharing consultation feedback. It is encouraging to read that coordination and cooperation will continue between the projects throughout their development and may enable elements of joint delivery should the technical and commercial conditions allow for this, reducing the potential impact of building the onshore connection to the national electricity transmission network for the two projects.

ESC is being consulted on and is aware of a number of energy related projects that may have an impact on our District, and we welcome and support collaborative working between all Applicants and the National Grid to ensure that the optimal solution is delivered. We expect this to involve coordination and the sharing of infrastructure where feasible to reduce the amount required onshore.

Seascape and cumulative impacts

We have reviewed the relevant statutory consultation material including the PEIR Non-Technical Summary and PEIR Report including (but not limited to) Chapter 6 Environmental Impact Assessment Methodology; Chapter 29 Offshore Seascape, Landscape and Visual Impact Assessment, Appendix 29.1 Seascape, Landscape and Visual Impact Assessment and Visualisation Methodology, and Chapter 29 SLVIA – Figures (Volume II); which collectively sets out the current environmental baseline, potential impacts, and initial proposals to mitigate those impacts.

In terms of the PEIR's Seascape Visual Impact Assessment (SLVIA), Section 3.3.2 within the Non-Technical Summary states that *'the impact assessment is based on a worst-case scenario of the largest turbines (40 wind turbines up to 397m above Mean High Water Spring (MHWS)) as this will result in longer distance visibility'.* The PEIR concludes that *'North Falls is predicted to have major (significant in EIA terms) effects on marine character areas, and moderate (also significant in EIA terms) effects on landscape character areas*

[3] Joint statement from North Falls, Five Estuaries and National Grid: Commitment to exploring coordinated network designs in East Anglia

and views at Sizewell Beach, cliffs above Thorpeness, Aldeburgh, Orford Ness, Shingle Street and Pulhamite Cliffs (Bawdsey Manor), as well as sections of the Suffolk Coast Path and Suffolk Coast and Heaths AONB with visibility of North Falls during operation influencing the seascape and landscape character'. It also concludes that *'There is potential for cumulative effects to occur with a number of other offshore wind farms during all project phases. Total cumulative effects are predicted to be significant (major) for effects on marine character areas, and there is potential for significant effects (moderate) for landscape and on certain viewpoints'.*

Section 29.8 within the PEIR Chapter 29 Offshore Seascape, Landscape and Visual Impact Assessment notes that *'whilst significant landscape and visual effects have been identified, there are no landscape mitigation proposals, which require monitoring, which could lead to a reduction in landscape and visual effects'.*

The commissioned update to the Suffolk Seascape Sensitivity Study (2020) reviews the sensitivity assessment previously undertaken using the same study area limits, assessing for wind turbines >400m to blade tip above Lowest Astronomical Tide (LAT) (more appropriate for the North Falls project at 397m to tip). The report update forms an addendum to the original assessment and together they will act as a framework and background study for assessing the likely seascape and visual effects of wind farms off of the Suffolk coast.

The update addendum to the Suffolk Seascape Sensitivity to Offshore Wind Farms Study (2020) was produced by White Consultants (June 2023) and is appended to this letter in Annex A. It finds that wind turbines at 400m and greater to tip height should be located no less than 40km from the Suffolk coast for the introduced visual effects on coastal communities and the AONB to fall below the medium magnitude threshold. It also assessed the average offshore visibility distances related to the percentage of days each year that turbines can be seen from coastal receptors. For comparison with the Five Estuaries project arrays (with the closest row of 424m turbines at approximately 37.7km from the Suffolk coast at the closest point), this assessment concluded that the turbines would be visible less than 33% of days each year due to visibility modifiers (i.e. meteorological/atmospheric conditions). North Falls (at only 22.5km from the Suffolk coast) would be expected to be visible more than this given their closer proximity and relative height at 397m to tip. On days where the turbines will be visible, it is expected that visual effects from within the AONB will be worse than medium magnitude (which supports the North Falls' PEIR conclusions).

In parallel to the Suffolk Seascape Sensitivity Study update addendum, White Consultants also undertook a comparison of seascape and visual impact assessment methodologies for East Anglia TWO/East Anglia ONE North offshore wind farms and the Five Estuaries offshore wind farm to ensure consistency in the PEIR approach adopted. The comparison report is appended to this letter in Annex B, the findings of which have been considered in reference to the North Falls PEIR assessment. It is noted that for the North Falls PEIR assessment, impacts to the Natural Beauty and Special Qualities of the Suffolk Coast and Heaths AONB are considered in Section 29.6 within Chapter 29 Offshore Seascape, Landscape and Visual Impact Assessment.

However, the Applicant's description of the implications of the Offshore Above-Sea Development for the Suffolk Coast & Heaths AONB (29.6.2.2.2, Offshore Seascape, Landscape and Visual Impact Assessment) refers to the baseline description in the 2013-2018 Suffolk Coast & Heaths AONB Management Plan and not the current 2018-2023 Suffolk Coast & Heaths AONB Management Plan. ESC, SCC and the AONB Partnership collectively conclude that this approach is not sufficiently robust for the assessment of potential impacts on the AONB. The PEIR seascape, landscape and visual impact assessment applies baseline descriptions taken from the 2013-18 management plan. It is acknowledged that for other NSIP consultations, the AONB Partnership has sought assessment of impacts against the 2016 Natural Beauty and Special Qualities document rather than the landscape character work outlined in in the 2013-18 management plan. The assessment should be made against the more recent Suffolk Coast & Heaths Area of Outstanding Natural

Beauty and Special Quality Indicators v1.8 November 2016 or the detailed Suffolk Landscape Character Assessment[4]. An assessment of the offshore element of the proposals should therefore be undertaken against the defined natural beauty and special qualities of the Suffolk Coast & Heaths AONB and not the summary landscape character assessment as referenced in 29.6.2.2.2, Offshore Seascape, Landscape and Visual Impact Assessment. However, it is acknowledged that the North Falls PEIR concludes moderate effects on landscape character areas along the Suffolk coast, being significant in EIA terms. Therefore, whilst a more updated assessment is required, it is unlikely to alter the PEIR conclusion given the proximity of the northern array to coastal communities of Suffolk and the AONB.

The maximum visual impact onshore will be in late summer afternoons when turbine blades face towards the coastline as it coincides with peak visitor periods at Suffolk coast locations. It is therefore clear from the PEIR findings that the current North Falls proposals (specifically the northern array of offshore wind turbines at only 22.5km from the Suffolk coast) will put the statutory purposes of the AONB designation at risk from the project alone and cumulatively with other projects due to the anticipated seascape visual impact introduced.

Coastal geomorphology

The PEIR assessment materials include Chapter 8 Marine Geology Oceanography and Physical Processes as well as the accompanying Figures (Volume II). Section 3.1 within the PEIR Non-Technical Summary concludes *'With the implementation of mitigation measures, North Falls is predicted to have no greater than negligible adverse (not significant in EIA terms) effects on marine geology, oceanography and physical processes during all project phases…. There is potential for cumulative effects to occur with a number of other offshore wind farms and other projects. However, when considering proposed mitigation measures, it is not anticipated that cumulative effects are likely to be significant in EIA terms'.*

As set out in ESC's non-statutory consultation response, our coastal management concern focusses on the potential for an increasingly dense wall of offshore wind turbines having an effect on their lee side, such that this alters wind driven wave patterns through a reduction in wind energy. Our comments therefore focus on the assessment of how wave energy will be affected as this appears to have the greatest potential to cause an impact on the East Suffolk coastline. The impact of wave energy interruption by turbine foundations arising from both this development in isolation and the entire licensed turbine field, for a number of wave directions, needs to be fully understood and modelling should include possible effects to the ESC shoreline. This is considered important because if there is a measurable impact which reduces wave energy on approach to the East Suffolk shoreline from an east/southeast direction, then it has potential to alter the net sediment drift balance at the shoreline. There are coastal locations where a reduction in the southerly component of net drift may be significant e.g., East Lane Bawdsey and Thorpeness.

It is requested that the final impact assessments undertaken for this project demonstrate consideration of the impact of wind energy interruption by the turbine array on lee side wave energy, in addition to turbine foundation interruption impacts, and this should provide a commentary on how this impact may impact net sediment trends over East Suffolk shorelines.

Heritage considerations

Within the PEIR Non-Technical Summary, Section 3.2.7 sets out the onshore archaeology and cultural heritage findings. As set out in ESC's non-statutory consultation response, there are various built heritage assets located on the East Suffolk coastline which could potentially be affected by the North Falls proposal

[4] https://suffolklandscape.org.uk/

including those that derive some of their significance from their visual, working and historic relationship to the sea, as part of their coastal location and maritime history. The latter would include the history of fishing, coastal protection, military defence and resort tourism, for example. The viewpoints previously set out in the EIA Scoping response cover most of these key areas of heritage significance for our District.

Consideration should also be given to some of our coastal Conservation Areas, these are designated heritage assets and, as they are area-based, may sustain wider-ranging impacts from the proposals than specified individual sites. The military chain of early 19th century Martello Towers is the most pre-eminent of our military coastal defence features, all of which are listed buildings and scheduled monuments, having a high level of designation. If the North Sea is regarded as part of the setting of these heritage assets and which partly contributes to their significance, then there is a statutory obligation to include them for the effect of the impacts arising from the proposed offshore development. This would include the separate and combined impacts arising from the northern and southern arrays, although it is acknowledged that combination effect will be smaller further north along the coastline.

Socio-economic effects and tourism

It is acknowledged that the PEIR contains Chapter 31 Socio-economics and accompanying Figures (Volume II); Appendix 31.1 North Falls Offshore Wind Farm Economic Impact; Chapter 32 Tourism and Recreation and accompanying Figures (Volume II). Within the PEIR Non-Technical Summary, Section 3.3.4 sets out the socio-economics findings and Section 3.3.5 sets out findings on tourism and recreation. The assessment included consideration of tourism assets and activities in both Essex and Suffolk, and Tendring Districts. For marine and coastal tourism and recreation, the study area was based on the SLVIA study area including the East Anglian coastal and offshore waters, the Suffolk coast and the Essex coast.

As set out in ESC's non-statutory consultation response, consideration must be given to how the visual impact of the turbines will affect visitors to the southern coastal areas of our District and the potential for economic displacement when this development is viewed in combination with the other proposed large energy/infrastructure projects in the region. Tourism plays an important role in the local economy across the East Suffolk District, with many coastal locations being popular holiday destinations, much of which is designated for its natural beauty and ecological importance. This consideration also needs to acknowledge that many of these areas are still recovering from the negative impacts of COVID19 on their businesses. Tourism impacts should be addressed by investment in place promotion and visitor 'assets'. ESC remains concerned that tourism effects may be felt in East Suffolk due to seascape visual impacts introduced by the proposed wind farm extension, either alone or in-combination with other NSIP projects.

Noting the matters raised in the seascape section of this letter, ESC still awaits further assessment being completed. The need for a detailed assessment of AONB special qualities has been highlighted to inform ESC's final position on the visual effects within the AONB, and we reserve the right to provide more detailed comments on socio-economic effects and tourism once this has been completed. However, it has already been acknowledged in the seascape section of this letter that the North Falls PEIR concludes moderate effects on landscape character areas along the Suffolk coast, being significant in EIA terms.

It was discussed earlier in this letter that Section 29.8 within the PEIR Chapter 29 Offshore Seascape, Landscape and Visual Impact Assessment notes that *'whilst significant landscape and visual effects have been identified, there are no landscape mitigation proposals, which require monitoring, which could lead to a reduction in landscape and visual effects'.* Residual visual effects on our coastline will therefore remain, and ESC are unable to support the PEIR's tourism and recreation conclusion which states *'With the implementation of mitigation measures, North Falls is predicted to have no greater than minor adverse (not*

significant in EIA terms) effects on tourism and recreation during all its phases…. There is potential for cumulative effects to occur with a number of other offshore wind farms and/or projects. However, when considering proposed mitigation measures, potential cumulative effects have been assessed as not significant (in EIA terms).' Our concerns relating to seascape visual impacts and the potential knock-on effects on tourism and recreation within our District therefore remains unchanged.

Future consultation and engagement

We understand that this response will also be shared with Five Estuaries Offshore Wind Farm as part of the coordination effort between the two projects. It is understood that the feedback received as part of this consultation will be used to refine the assessment and mitigation proposals within the final Environmental Statement submitted for Examination as part of the DCO process. ESC welcomes ongoing engagement with the North Falls project as the DCO application progresses and we trust the feedback provided in this letter is useful, being read alongside our earlier consultation responses and the EIA Scoping response submitted by ESC to PINS in Autumn 2021.

Conclusion

Having reviewed the North Falls PEIR assessment and findings, alongside the recently commissioned White Consultants report updates (June 2023), the northern array is due to contain wind turbines up to 397m to tip at a distance of only 22.5km from the Suffolk coast.

In terms of wind turbine visibility, the North Falls PEIR concludes moderate effects on landscape character areas along the Suffolk coast, being significant in EIA terms. It has been acknowledged within the PEIR assessment that there are no landscape mitigation proposals which could lead to a reduction in visual effects, and it can therefore be concluded that the mitigation hierarchy would be unable to fully mitigate the anticipated effects and that residual impacts would remain upon the AONB special qualities.

It is therefore clear from the PEIR findings that the current North Falls proposals (specifically the northern array of offshore wind turbines) will put the statutory purposes of the AONB designation at risk from the project alone and cumulatively with other projects due to the anticipated seascape visual impact introduced. It is also possible that residual impacts could have a detrimental effect on tourism and recreational activities in these areas.

Therefore, ESC does not support the current North Falls project given the magnitude of seascape visual impacts anticipated on Suffolk coastal communities and the special qualities of the AONB. Notwithstanding ESC's carefully considered objection to the scheme, if the Secretary of State decides to consent the scheme, ESC (in conjunction with SCC as host Authority and the SCHAONB Partnership) will be seeking appropriate compensation to offset the seascape impacts introduced by the current offshore wind turbine layout.

Yours sincerely,

Philip Ridley BSc (Hons) MRTPI | Head of Planning and Coastal Management
East Suffolk Council

Annex A - Suffolk Seascape Sensitivity to Offshore Wind Farms Study update addendum - White Consultants (June 2023).

Annex B - Comparison of seascape and visual impact assessment methodologies for East Anglia TWO/East Anglia ONE North offshore wind farms and Five Estuaries windfarm – White Consultants (June 2023).