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Date: 02 December 2022  
Our Ref: Second North Falls Non-Statutory Consultation Response  
Enquiries to: Grahame Stuteley  
Email: [grahame.stuteley@eastsuffolk.gov.uk](mailto:grahame.stuteley@eastsuffolk.gov.uk)

Dear Sirs,

**Re: East Suffolk Council's response to the second North Falls Offshore Wind Farm Project Informal Consultation (17 October – 9 December 2022).**

Thank you for your email dated 17 October 2022 inviting East Suffolk Council (ESC) to provide feedback on the second round of non-statutory consultation for the North Falls offshore wind farm project. We understand that following an introductory consultation held in October 2021, this second round of non-statutory consultation sets out how proposals have progressed over the past 12 months, focussing on the project's proposed onshore infrastructure within the Tendring District, Essex.

You are inviting comments on the emerging proposals and seeking feedback on the onshore cable route and substation and information for the proposed offshore infrastructure, search area for the offshore cables, and details regarding the proposed point of landfall in Essex. We understand there will be further opportunities to engage in the statutory consultation process scheduled in 2023 prior to submission of the application, noting that feedback obtained in the current consultation will help to finalise the Preliminary Environmental Information Report (PEIR), due for completion in early 2023. This forms the basis of next year's statutory consultation on the proposals and project's Environmental Impact Assessment (EIA) process and the progress made for the preparation of the development consent order (DCO) application.

The consultation materials confirm 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 North Essex. This is in proximity to the proposed East Anglia Green project's connection substation south of Lawford. The cable route is expected to make landfall between Frinton-on-Sea and Holland-on-Sea and the onshore cables would be laid underground.

ESC provided feedback on the first round of informal consultation which referred to our earlier responses for the EIA Scoping Report consultation submitted to the Planning Inspectorate as well as the Inspectorate's Scoping Opinion published in August 2021. As previously set out in our feedback provided on the early proposals, 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, at a distance of 22.5km at the closest point, there will be wind turbine visibility from the coastal communities and designated landscapes located on the Suffolk Coast.

The offshore array areas will be visible from the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and therefore we are providing comments in relation to the seascape, landscape and visual impacts

of the project. 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 East Suffolk Council District, however, should this change in future, our position on this project may need to be revisited. ESC therefore request that should there be any amendments to the onshore connection location for the project, the Council is informed. This letter provides you with ESC's feedback on the early proposals for your consideration and should be read in conjunction with the previous ESC responses submitted.

#### Need case

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 BEIS Offshore Transmission Network Review (OTNR).

It is understood that the developer of North Falls is engaging with the OTNR as is the developer of the Five Estuaries project. Whilst it is welcomed that the North Falls project, alongside other developers, has committed to exploring options within the Early Opportunities workstream<sup>1</sup>, 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 currently remains 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.

#### Seascape and Landscape Visual Impact Assessment (SLVIA) and Viewpoints

ESC previously highlighted the importance of viewpoints in the EIA Scoping response, noting that illustrative viewpoints (alongside representative viewpoints) will be required to provide technical analysis and understanding of the potential onshore visual effects from the offshore wind turbines. Specific viewpoints were highlighted for consideration (including at coastal heritage assets) to enable an assessment of potential cumulative effects on the AONB from the existing and proposed offshore wind farms. It is important to fully assess and understand the potential curtaining effects introduced by additional wind turbines on the seascape horizon within these views. It was also noted that there is potential for sequential visual effects to users of the Suffolk/England Coast Path, including in combination with other projects, and these effects should be assessed, a view supported by the Inspectorate in the Scoping Opinion (5.11.10).

The special qualities and purpose of the AONB's designation must be given consideration in ongoing assessments, given the size and location of the proposed wind turbines. It is considered that the statutory purpose of the designation may be put at risk from the project alone and cumulatively with other projects. The potential curtaining effect of the horizon when viewed from the shore in these areas should be fully understood, including all existing and proposed developments which could contribute to this effect. It is recognised that this will be considered within subsequent detailed assessments, it is however important to highlight now that careful consideration should be given to the siting, layout and scale of the offshore array (or different sections of the offshore array), in order to seek to minimise any impacts.

It is anticipated that the maximum visual impact onshore will be in late summer afternoons when turbine blades face towards the coastline and this must be fully assessed in the SLVIA as it coincides with peak visitor periods at Suffolk Coast locations. It was noted that the Inspectorate considers that in addition to the assessment of landscape and visual effects, the SLVIA will need to consider impacts to the Natural Beauty

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<sup>1</sup> [Joint statement from North Falls, Five Estuaries and National Grid: Commitment to exploring coordinated network designs in East Anglia](#)

and Special Qualities of the Suffolk Coast and Heaths AONB, as these form part of the purpose of the designation (5.11.14). The Inspectorate also stated that the Environmental Statement (ES) should explain how the cumulative assessment has included all relevant developments that may have cumulative effects on seascape, landscape and visual effects and how these have been assessed (5.11.11).

ESC's response to the EIA Scoping Report also expressed concerns regarding the scoping out of construction impacts, noting that the effects of construction activities to seascape and coastal character, designated landscape (Suffolk Coasts and Heaths AONB) and visual receptors should be understood and evaluated. The scoping out of these impacts was not supported by the Inspectorate (5.11.1), placing a requirement for the construction phase impacts of offshore infrastructure to be scoped into the assessment. The Inspectorate's justification for this was in reference to the construction period being expected to last at least 5 years during which time there is potential for impacts arising from the presence of construction activity and partially complete wind turbines that could detract from the character of the landscape.

The Inspectorate is aware (5.11.6) that there are a number of other projects, including Nationally Significant Infrastructure Projects (NSIPs) such as East Anglia ONE North and TWO Wind Farms, Five Estuaries Offshore Wind Farm and Sizewell C, located within the likely study area for the Proposed Development. This is in addition to the existing wind farms present. There is the potential for cumulative impacts to occur as a result of temporal and spatial overlap of the North Falls project with these other NSIPs which needs to be adequately assessed.

In addition, ESC suggested that the study area radius should be extended to 60km due to the increased vertical height of the North Falls wind turbines (approximately 400m to blade tip depending on final selection). The Inspectorate notes that (5.11.7) the study area for impacts from the array areas should be determined relevant to the extent of the impacts and the potential for significant effects, potentially resulting in a study area beyond the 50km specified. The selection of the study area should be informed by the Zone of Theoretical Visibility (ZTV).

#### Heritage considerations

As discussed in greater detail within our previous consultation response, there are various built heritage assets which could potentially be affected by the North Falls proposal 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

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'. There is a possibility 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, we therefore await further assessments being completed before providing detailed comments regarding whether economic impacts are anticipated.

#### Coastal geomorphology

ESC's only coastal management concern is in reference to the potential for an increasingly dense wall of turbines having a significant effect on the lee side, such that this alters wind driven wave patterns through a reduction in wind energy. It may also be possible that the turbine wall might reduce potentially harmful wave energy and consideration of any impacts on the wind/wave climates should be considered in the ES to ensure any such effects are fully understood.

#### Noise and air-quality

ESC has no immediate concerns in relation to noise and air quality impacts at this stage. Impacts on air quality would only be possible if a significant volume of traffic is expected to be introduced on our road network through in-combination effects with other projects in the region. If this is the case, then further assessment of potential impacts may be necessary.

#### Ecology

ESC defers the offshore and onshore elements to Natural England and the relevant Essex Authorities. Whilst we have no detailed ecological comments to make at this stage, we will keep the project under review in case there are any changes which necessitate our involvement.

#### Future consultation and engagement

This second round of non-statutory consultation has held five in-person events at locations in Essex, primarily near to the proposed onshore infrastructure within the Tendring District (i.e. Frinton-on-Sea, Great Bromley, Clacton-on-Sea, Thorpe Le Soken and Ardleigh). We note that no public exhibitions were being held in East Suffolk at this stage of the DCO pre-application consultation. We therefore wish to take this opportunity to stress the need to ensure that future engagement includes the local communities which are expected to experience seascape visual impacts, such as the coastal communities in East Suffolk and users of the Suffolk Coast and Heaths AONB located outside of the onshore scoping area.

ESC wishes to reiterate the importance of such events which should focus on the agreed viewpoints for the SLVIA in the first instance as they were considered the most visually sensitive locations. These must be held as part of the statutory PEIR consultation in 2023, being a firm request within the Statement of Community Consultation (SoCC) feedback provided for the project earlier this year. We understand that the statutory consultation is due to include significantly more detail on the project, including both construction, operation, and eventual decommissioning, setting out its potential benefits and impacts as considered through the ongoing environmental impact assessment phase.

ESC is being consulted on and is aware of a number of energy related projects that may have an impact on our District. We urge collaborative working between all Applicants and 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. This should also include consideration of ways to coordinate further during the pre-application, examination and post consent phases where possible.

This letter should be taken as a holding response until further assessment has been undertaken for the project and the potential for SLVIA are fully understood in reference to the concerns raised.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Philip Ridley', with a long horizontal flourish underneath.

Philip Ridley BSc (Hons) MRTPI  
Head of Planning & Coastal Management