



North Falls Offshore Wind Farm Limited
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire
SN5 6PB
contact@northfallsoffshore.com

Date: 6th December 2021
Our Ref: North Falls Informal Consultation Response
Enquiries to: Grahame Stuteley
Email: grahame.stuteley@eastsoffolk.gov.uk

Dear Sirs,

Re: East Suffolk Council's response to the North Falls Offshore Windfarm Project Informal Consultation (25 October – 10 December 2021).

Thank you for your email dated 27th October 2021 inviting East Suffolk Council to provide feedback on the North Falls Offshore Wind Farm Informal Consultation. We understand that the consultation introduces the general principles of the project to local people and invites comments and feedback in a variety of ways. East Suffolk Council therefore provide feedback on the early proposals for the project in this letter for your consideration. This response makes reference to the Environmental Impact Assessment (EIA) Scoping Report consultation response previously submitted to Planning Inspectorate (PINS) by East Suffolk Council (ESC) as well as the Inspectorate's Scoping Report published in August 2021.

East Suffolk Council acknowledge 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 40GW 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 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. 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.

As previously set out in our response submitted to PINS for the EIA Scoping Report consultation in August 2021, ESC is not a host authority or a direct neighbouring authority of the onshore scoping

area. The offshore array areas will however be visible from the Suffolk coastline and designated 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.

Seascape and Landscape Visual Impact Assessment (SLVIA) and Viewpoints

East Suffolk Council 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 coastal heritage assets such as Landguard Fort and Bawdsey Manor. Viewpoints from Southwold Pier, Gun Hill Southwold, Dunwich Coastguard Cottages, Sizewell Beach, cliffs above Thorpeness, Felixstowe seafront gardens and further north at Covehithe are also considered relevant to enable an assessment of potential cumulative effects to Suffolk Coast and Heaths 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 is noted that the Inspectorate supported this recommendation, also noting 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. It was also concluded that potential effects on designated landscapes such as the Suffolk Coast and Heaths AONB and Heritage Coast resulting from the location and design of the onshore infrastructure (once this has been fixed) also needs to be assessed in the Environmental Statement.

The special qualities and purposes of AONB designation must be given consideration in ongoing assessments, given the size and location of the proposed wind turbines in relation to the Suffolk Coast and Heath AONB, it is considered that the statutory purposes 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, including East Anglia One North which was initially suggested to be scoped out for the cumulative assessment.

We understand that the Inspectorate is aware 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, which have the potential for overlapping construction programmes and possible combined effects. It was concluded that East Anglia ONE North Wind Farm should also be scoped into the assessment on the basis that the turbine array is likely to be viewed in combination with the proposed development from the Suffolk Coast and Heaths AONB. The Inspectorate stated that the 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.

Our 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 Coast and Heaths AONB) and visual receptors should be understood and evaluated. We understand that the scoping out of these impacts was not supported by the Inspectorate, 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.

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 (at 398m to blade tip). We understand that the Inspectorate notes that 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).

As indicated previously, the proximity of the array to the Suffolk Coast and Heaths AONB combined with the proposed height of the turbines may put the Statutory Purposes of the designation at risk. 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.

Heritage considerations

Built heritage assets potentially affected by the North Falls proposal include 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.

Some locations adjacent the sea (such as the military installation at Orfordness) did not rely on views out to the sea for their operation and, therefore, impacts from this proposal would not necessarily have any effect on their significance. The suggested viewpoint at the former Orfordness Lighthouse seems redundant since the lighthouse was demolished in 2020 and we do not regard seascape views as integral to the significance of the remaining protected structures at this location.

Consideration should also be given to some of our coastal Conservation Areas, these are designated heritage assets and, as they are area-based, may actually have to sustain wider-ranging impacts from these proposals than specified individual sites. We suggest the Conservation Areas at Felixstowe and Felixstowe South, Orford, Aldeburgh, Thorpeness, Dunwich, Walberswick and Southwold are therefore considered. The suggested viewpoint (and visualisation) at Aldeburgh seafront (which is part of the Conservation Area) is one good example of what is an appropriate location and illustration.

The military chain of early 19th century Martello Towers are the most pre-eminent of our military coastal defence features – including the one in the Council's ownership (Tower P) in Felixstowe

South. These are all listed buildings and scheduled monuments and have a high level of designation. It may be that a representative collective viewpoint for this key group could also be considered for inclusion.

We also consider it reasonable to suggest inclusion of these designated heritage assets due to the forward position of the North Falls Offshore Wind Farm (being located closer to the coastline), and the quantum of turbines combined with their proposed scale. 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 sites, although it is acknowledged that combination effects will be smaller further north along the coastline.

Socio-economic effects and tourism

We understand from the consultation material that North Falls seeks to bring socio-economic benefits to the local economy and community through the creation of jobs and community involvement, noting that the project has invested more than £250,000 in community funds and local training initiatives to date. We understand that the location of the onshore infrastructure is yet to be determined as a grid connection location for the project has not yet been provided, however this is understood to be in North Essex within the Tendring District. However, as discussed for the SLVIA onshore impacts can be felt in other coastal areas outside of North Essex.

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. There may also be cumulative impacts with other projects not previously mentioned (including SEA Link, Nautilus and Eurolink) and such impacts must be fully considered. 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.

Investment in local skills and training initiatives does not directly replace impacts on tourism on its own, but we acknowledge that this can be a form of compensation for a loss in one area by a benefit in another. Tourism impacts should be addressed by investment in place promotion and visitor 'assets' and also through mitigation required in relation to seascape impacts. Whilst it is possible that tourism effects may be felt in East Suffolk, noting that this proposal is due to be located outside of our District, we will wait until further assessments have been completed and reviewed before providing further comments regarding whether economic impacts are anticipated from the proposed wind farm extension.

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

We defer the offshore elements to Natural England and, as the landfall is in Essex, the 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.

The comments made in this letter are based on the information available, however we trust the feedback provided is useful and it should be read alongside the earlier EIA Scoping response submitted by ESC to PINS in August. We understand that a more detailed consultation will follow in the new year as part of the development consent process, with formal statutory consultations being expected in Q2 and Q4 2022.

We welcome ongoing engagement for this project and look forward to future discussions at the Expert Topic Group (ETG) meetings moving forwards.

Yours sincerely,

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 and Coastal Management