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Date: 11 August 2022  
Our Ref: Five Estuaries Non-Statutory Consultation Response  
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FAO: James Eaton – Onshore Consent Manager

**Re: East Suffolk Council's response to the Five Estuaries Offshore Wind Farm Non-Statutory Consultation (30<sup>th</sup> June – 12<sup>th</sup> August 2022)**

Thank you for your email dated 30<sup>th</sup> June 2022 inviting East Suffolk Council (ESC) to provide feedback on the Five Estuaries offshore wind farm non-statutory consultation. We understand that this consultation primarily focusses on the onshore scoping area within the Tendring District, Essex, inviting comments on the emerging proposals and seeking feedback on the onshore cable route and substation whilst presenting information for the proposed offshore infrastructure, search area for the offshore cables, and details regarding the proposed point of landfall in Essex.

In your recent correspondence with elected members, you advised that National Grid has indicated that they would like you to connect to their proposed East Anglia Connection Substation south of Lawford in Essex, which is part of their East Anglia GREEN project. The cable route is expected to make landfall between Frinton-on-Sea and Holland-on-Sea in Tendring, Essex, and the onshore cables would be laid underground. As previously set out in our response submitted to the Planning Inspectorate (PINS) for the Environmental Impact Assessment (EIA) Scoping Report consultation held in Autumn 2021, 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, you have acknowledged that there will be some wind turbine visibility from the Suffolk Coast.

The offshore array areas will be visible from the 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 Five Estuaries 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.

We understand that you are keen to get feedback from the communities that may be impacted by your project and this letter provides you with ESC's feedback on the early proposals for your consideration. This letter should be read in conjunction with the previous ESC response submitted

to PINS for the EIA Scoping Report consultation as well as the Inspectorate’s Scoping Opinion published in November 2021.

### 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 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 Five Estuaries is engaging with the OTNR as is the developer of the North Falls project. Whilst it is welcomed that the Five Estuaries 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 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.

### 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.

The special qualities and purposes 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 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. 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.

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

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 popular with visitors. This requirement was also supported by the Inspectorate in the Scoping Opinion. ESC's response to the EIA Scoping Report expressed the need for the SLVIA to be informed by the Suffolk Coast Landscape Character Assessment. Concerns were also expressed regarding the scoping out of construction impacts. The effects of construction activities to seascape and coastal character, designated landscape (Suffolk Coast and Heaths AONB) and visual receptors must be fully understood and evaluated.

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, North Falls Offshore Wind Farm and Sizewell C, located within the likely study area for the Proposed Development. There is the potential for cumulative impacts to occur as a result of temporal and spatial overlap of the Five Estuaries project with these other NSIPs which needs to be adequately assessed.

#### Socio-economic effects and tourism

Whilst 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 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 Environmental Statement (ES) to ensure any such effects are fully understood.

#### Future consultation and engagement

This non-statutory consultation has been presented primarily as a virtual online exhibition, however despite two in-person events being held at locations near to the proposed onshore infrastructure within the Tendring District, Essex (i.e. Lawford and Frinton-on-Sea), we note that no public exhibitions are being held in East Suffolk at this stage of the DCO pre-application consultation. We therefore wish to take this opportunity to reiterate the points previously discussed at the Five Estuaries meeting held on 4th May 2022 and the subsequent project catch up meeting on 24<sup>th</sup> June 2022. This stressed the need to ensure that community 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. It was previously discussed that such events could focus on the agreed viewpoints for the SLVIA in the first instance as they were considered the most visually sensitive locations.

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

We understand that events for coastal communities will be held as part of the formal consultation in Q1 2023, being reflected within the Statement of Community Consultation (SoCC) later this year and thereby avoiding the same pitfalls raised with the North Falls project SoCC and consultation. This approach is welcomed by ESC. You have advised 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 welcomes ongoing engagement with the Five Estuaries project as part of the pre-application process and we trust the feedback provided in this letter is useful, being read alongside the earlier EIA Scoping response submitted by ESC to PINS in Autumn 2021.

East Suffolk Council is being consulted on and is aware of a number of energy related projects that may have an impact on our District. 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. This letter should therefore 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 sincerely

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

Philip Ridley  
Head of Planning & Coastal Management

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