



Ms. Helen Lancaster  
Senior EIA Advisor on behalf of the Secretary of State  
The Planning Inspectorate  
Environmental Services  
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Our Ref: Five Estuaries Scoping Report Response  
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Dear Ms. Lancaster,

**Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – Regulation 10.**

**Application by Five Estuaries Offshore Wind Farm Ltd for an Order Granting Development Consent for the Five Estuaries Offshore Wind Farm - response from East Suffolk Council (ESC) to the Scoping Report submitted to the Secretary of State.**

Thank you for your letter dated 05 October 2021 and the opportunity to comment on the Five Estuaries Offshore Wind Farm Scoping Report (30 September 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 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, the scope of the Environmental Impact Assessment would need to be revisited.

**Proposed Methodology**

The following comments are provided for your consideration in relation to the proposed methodology as set out within the submitted Scoping Report:

- In reference to Sections 16.2.8 – 16.2.9 (page 338), ESC notes that the theoretical visibility of the proposed Five Estuaries wind turbines mainly occurs within 60km, beyond this distance visibility becomes restricted due to the geographic extent and earth curvature. The

proposed study area radius of 60km is therefore considered acceptable to ESC and confirms the conclusions of preliminary discussions held by the Applicant in August 2021. It is noted that if this distance requires refining as a result of the progress of further studies, additional consultation will take place with stakeholders which is welcomed.

- The Baseline Data applied in Section 16.3, Table 16.1 (pages 339 - 342) sets out the key sources of information for seascape, landscape and visual matters. This table has been reviewed and its contents are considered to be suitable and acceptable to ESC.
- ESC supports the recognition of existing windfarms in the assessment baseline, noting that this is an important factor for consideration.
- Table 16.2 (pages 349 – 351) sets out the landscape designations with relevance to the Seascape and Landscape Visual Impact Assessment (SLVIA) for Five Estuaries. ESC notes the reference to Special Landscape Areas (SLA); however these no longer form part of East Suffolk Local Plan policy and any reference to them should be removed from the assessment. The remaining designation items contained in Table 16.2 are agreed.
- Having regard to possible onshore visual effects, it should be noted that the maximum visual impact is likely to be experienced on late summer sunny afternoons/early evenings when there is a south-western airstream that turns turbine blades to ‘face’ towards the coast. When the sun is low in the sky behind the viewer, visual effects are expected to represent the worst-case scenario. Subject to weather conditions, views will be widely available from coastal locations both on the shore and from elevated locations back from the beach or cliffs. It is therefore recommended that assessors take this scenario into consideration when undertaking their assessment of onshore visual effects. Baseline photography should be taken late in the afternoon where possible, particularly from the most well used resort based public viewpoints, in order to capture these effects.
- It is noted on page 111 of the Scoping Report that initial discussions regarding the selection of viewpoints to inform the EIA were held on 15<sup>th</sup> July 2021, ESC attended this discussion and has reviewed the list of proposed viewpoints included in the SLVIA as listed in Table 16.3 (pages 335 – 358). We note that these contain both ‘representative’ and ‘illustrative’ viewpoints and can confirm that the list is acceptable to ESC.
- Table 16.3 includes night-time viewpoints; this is supported by ESC and is representative of the assessments undertaken for other projects on the Suffolk coast.
- Table 16.4 (pages 362 – 373), and section 16.3 therein, sets out the impacts proposed to be scoped in to the SLVIA. It is assumed that the Landscape Character Types listed to be scoped in will also be informed by relevant sections of the Suffolk Coastal Landscape Character Assessment. Table 16.4 is acceptable on that basis.

- Table 16.5 (pages 374 – 376) sets out the impacts to be scoped out of the SLVIA, these have been reviewed and are agreed by ESC.
- Sections 16.6.10 – 16.6.15 (page 382 - 383) state that ongoing consultation with relevant statutory and non-statutory organisations, the public and interested parties will be a key feature of the SLVIA process from the pre-application to examination stage. This is welcomed by ESC, and we look forward to the ongoing dialogue with the Applicant.
- The Baseline Data applied in Section 16.3, Table 16.1 (pages 339 - 342) and as listed in Section 16.5.3 (page 359) is acceptable to ESC, however we wish to emphasise the importance of the following documents when assessing the Suffolk Coast and AONB:
  - Suffolk Seascape Character Assessment <https://suffolklandscape.org.uk/landscape-typology/seascape-typology/> (Section 16.4.8, page 343)
  - Natural Beauty and Special Qualities of the Suffolk Coast and Heaths AONB <https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/sizewell-nuclear-power-station/aonb-special-qualities-document/> (Table 16.1, page 341)
  - Designation History Series <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004113-SCC%20The%20Designation%20History%20of%20the%20Suffolk%20Coast%20and%20Heaths%20AONB%20220221.pdf>
  - Development in the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/ENDORSED-SCH-AONB-Position-Statement-on-Development-in-Setting-of-AONB-2015.pdf> (Table 26.1, page 553)

### **Assessment of sequential impacts on the Suffolk/England Coast Path**

As part of the SLVIA the Applicant should also consider sequential visual effects on users of the Suffolk/England Coast Path. Furthermore, we note that the accumulation of multiple non-significant visual effects along such a route *may* when taken together be of significance. This assessment will also need to consider the cumulative and in-combination sequential visual effects with other projects and proposals.

### **Approach to consideration of visibility of the turbines**

The seasonality of adverse impacts and the concentration of highest visibility days in certain period of the year, some of which coincide with peak visitor period, should also be a consideration and we refer the Applicant to the following published material as a guide to carrying out their own research and gathering baseline information:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010078/EN010078-001586-6.3.28.8%20EA%20ES%20Appendix%2028.8%20Offshore%20Windfarm%20Visibility.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010078/EN010078-001587-6.3.28.9%20EA%20ES%20Appendix%2028.9%20Met%20Office%20Vessel%20Visibility%20Data%20Study.pdf>

### **Assessment of the of the proposals on the Natural Beauty and Special Qualities of the AONB**

ESC is pleased to see that the ‘*Suffolk Coast & Heaths AONB Natural Beauty and Special Qualities Indicators (2016)*’ document has been included in Table 16.1 (pages 339 – 342) which sets out the key sources of information applied for seascape, landscape and visual assessment. The [Natural Beauty and Special Qualities](#) of the AONB assessment describes how the purposes of AONB designation and the objective to “Conserve and Enhance Natural Beauty” is expressed, and this is an important consideration for this assessment.

### **Consideration of potential risks to the S82 purposes of designation of the AONB**

Given the size and location of the proposed turbines in relation to the Suffolk Coast and Heaths AONB, it is considered that the Statutory Purposes of the designation may be put at risk by this development, both from its impacts alone and cumulatively with other developments. Therefore, it is considered that the effects of the development on statutory purposes are likely to be a key consideration for Statutory Consultees, Interested Parties, and the Secretary of State. Natural England will be able to provide further guidance on this issue as the advisory body to Government on protected landscapes, and we defer to their expertise in this matter. See <https://www.legislation.gov.uk/ukpga/2000/37/section/82>

### **Assessment of cumulative landscape and visual effects, including curtaining**

Particularly in views from the northwest, it is anticipated that the proposal will contribute both alone and in combination with others to a curtaining of the horizon when viewed from the Suffolk Coast and Heaths AONB. The Applicant will need to carefully consider the extent and significance of these effects, and their implications for both the Natural Beauty of the AONB and the purposes of designation.

### **Scoping out of construction impacts**

Table 16.5 (pages 374 – 376) seeks to scope out the impacts of construction, however noting the distance of the proposed Five Estuaries array offshore, and that construction impacts will not exceed the operation effects in terms of magnitude, they will both extend the duration of these effects and potentially interact with constructing projects both offshore and on the coast, (at Sizewell C for example). This is expected to generate adverse effects that should be understood and evaluated. In this respect the inclusion of two beach landing facilities during the Sizewell C construction phase strongly indicate that the Sizewell C development should be included in cumulative assessments.

**Further consideration for consultees (Section 16.7 page 383)**

Section 16.7 provides seven specific questions for consultees to consider in relation to the seascape, landscape and visual matters for the project. ESC has provided comments in this letter which address the questions raised as part of this consultation process.

**Conclusion**

East Suffolk Council's comments in relation to the seascape, landscape and visual section of the Scoping Report have been outlined above. We trust our comments are helpful and given due consideration to ensure that the environmental statement associated with the Five Estuaries Offshore Wind Farm Development Consent Order is robust.

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 of infrastructure required onshore. This would align with intentions within the recently published Net Zero Strategy: Build Back Greener ([net-zero-strategy.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101321/net-zero-strategy.pdf)), to *'adopt a new approach to onshore and offshore electricity networks to incorporate new low carbon generation and demand in the most efficient manner, taking account of the environment and local communities'* (p.94, October 2021).

Yours sincerely,

Grahame Stuteley  
Senior Energy Projects Officer