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Date: 17 May 2024  
Sent Via Email:  
[Rivenhalliwmf@planninginspectorate.gov.uk](mailto:Rivenhalliwmf@planninginspectorate.gov.uk)

Dear Mr. Manning,

**Essex County Councils (ECC) Five Estuaries (FE) Relevant Representation:  
PINS registration identification number: 20048269  
Application by Five Estuaries Wind Farm Limited (FE) for a Development Consent Order (DCO) for the proposed Five Estuaries Offshore Wind Farm, an extension to the operational Galloper Offshore Wind Farm located off the Tendring Coast, Essex.**

Essex County Council (ECC) have been working closely with Tendring District Council (TDC) to provide input into the planning process for the Five Estuaries proposal. This pre-submission process has been lengthy and ECC's response to the previous rounds of consultation, and the as submitted Consultation Report (APP-031) and as collated in the appendix at APP-033). Hence please accept this response which we would ask is considered in conjunction with representations from TDC. There are no areas of disagreement between the host Council's. ECC have both seen and endorsed the comments as made by TDC at this Relevant Representations stage of the DCO process.

The following points represent a concise overview of ECC's concerns with the FE DCO that will be expanded on in the Local Impact Report (LiR). It is noted that the intent of this Relevant Representations stage is not to provide detail as this will be contained within ECC's forthcoming LiR. ECC note Regulation 4 of The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015, where interested parties are asked to include a summary of points which we agree and/or disagree with about the application, highlighting what you consider to be the main issues and impacts.

- ECC supports the Government's Energy Security Strategy which promotes offshore wind expansion to reach a goal of 50 GW of offshore wind production by 2030, however this must be balanced against the impact of the development within the local area.
- The application is considered premature at this time. It assumes an underground connection into a proposed substation, East Anglian Connection Node (EACN) east of Ardleigh. This is part of the National Grid Norwich to Tilbury (N2T) upgrade, itself a DCO proposal. The EACN is unconsented and the N2T proposal is at this time in Statutory Consultation stage. ECC in consultation (APP-033) has stated its clear preference for a coordinated approach between the different proposed offshore windfarm extension projects and multi-purpose interconnector projects within the vicinity of this project.
- ECC, like TDC, believes that an offshore integrated approach to achieving the UK's net zero legislative targets is the most appropriate. As such ECC believe the outcome of Offshore Coordination Support Scheme (OCSS) feasibility study into an offshore connection to Sealink (grant funded from Department of Energy Security and Net Zero) could illustrate how the offshore is achievable. In this respect, the application is premature.
- On balance it is considered that the developers of these separate projects have not presented a comprehensive and conclusive set of evidence that the transmission objectives of this project cannot be met using alternative link(s) to reduce the impact of onshore infrastructure on the terrestrial environment in Essex or Suffolk. If an alternative offshore solution with reduced impacts was to be delivered, in a timely manner, without risking wider Net Zero and decarbonisation targets, it would be welcomed by the County Council. Such a proposal would negate the need entirely for this project to landfall in Tendring, to cross a length of undisturbed rural land for the laying of underground cables and remove the requirement to provide an as proposed substation, as is here proposed by the DCO, on land in Ardleigh Road at the Junction with Grange Road.
- ECC has raised serious objection to the N2T DCO proposal, part of which is of particular reference to FE, in that the proposed connection point provided by N2T would be in Lawford. ECC are of the view that there are clear and demonstrable reasons why this location is completely unacceptable in what is a flat, open rural landscape. By VE constructing its own independent substation, linking to the current proposed Grid connection point at Lawford, it would contribute to the in-combination effects both during the construction phase and when built. FE as a project seeks consent for its own substation before connection to the Grid substation, this will result in the provision of significantly harmful industrial type infrastructure in an

open, tranquil rural area from the proposal as submitted, from N2T, FE and in addition from North Falls, another similar DCO proposal, which has also been out to stages of consultation, and which we understand will come forward later in 2024. This means the area around Lawford, where one substation already exists, could result in four independent sub stations in close proximity to each other (one existing in Ardleigh Road, plus 3 more by separate DCO's). The area of land around Lawford and its rural farmland environment is sensitive to change and, when looked at in combination with the aforementioned developments, the impact of a quasi-industrial development of the scale as proposed would be injurious to the local area and its surroundings, when taking into account in combination effects.

- ECC also note that the landscape around Lawford and the proposed substation location is an open and exposed plateau with a low density and rural settlement pattern, therefore any changes to the landscape will undoubtedly have an adverse impact on visual amenity and landscape character. Therefore, mitigation measures and landscape enhancements must be appropriately considered to ensure these are minimised considerably.
- For socio economic, recreation, and community impact ECC believes that the potential impacts and disturbance placed on local communities by the construction and operation of onshore transmission networks cannot be adequately dealt with through the planning system and it is necessary for FE to provide a voluntary Community Benefit Contribution (CBC) package to host local communities. The CBC package would recognise the role of local communities that are being asked to host nationally significant infrastructure projects that will contribute significantly to the government's commitment to Net Zero and energy security. Such a fund could be used to support local initiatives including, but not limited to, the provision of community woodlands, tree and hedgerow planting, the establishment of traditional orchards and the enhancement of wildlife habitats. Local community groups, parish councils and voluntary sector organisations would be encouraged to make applications to this fund.
- Measures to address social value and community benefit are important to ECC and TDC. Whilst there continues to be ongoing engagement with the applicant, there are no definitive commitments to education, training or employment within the District. Like TDC we would consider any project of this scale that does not address the economic disparity of those unable to access jobs through the transition to net zero to be unacceptable.
- As for the impact on tourism, which is identified as a key component of the Tendring District Local Plan 2013 – 2033 and Beyond, as was formally adopted by the Council in two sections – Section 1 in January 2021 and Section 2 in January 2022, Policy PP8

(Section 2 of the Plan) identifies tourism as a key component to the areas socio-economic profile is worth more than £276 million to the Tendring District. With the area containing a significant number of tourist destinations, and a wide variety of differing types of available accommodation, tourism is the main contributor to the local economic job profile, whether that is directly in hotels, caravan and chalet parks and tourist attractions or indirectly in shops, cafés and restaurants. The landward side of the construction works as proposed by this DCO proposal could have a significant impact on the areas attractiveness to tourism, with disturbance to both the attractiveness of the rural landscape and transportation as a result of the DCO within the wider Tendring peninsular.

- Transportation within this largely rural area is a concern for the size and number of vehicles needed to implement this development. ECC as the Highway Authority have concerns over similar offshore schemes occurring in the local area (these being North Falls and N2T) and every effort should be made for the schemes to work together to reduce impact and disruption to local communities, and without unacceptable impact on the local environment.
- ECC welcomes the applicant's commitment to provide biodiversity net gain (BNG) but notes the applicants intent to propose a 5-year aftercare period for landscape retention. In a County which is recognised as being the driest ECC would ask that this period is extended to ensure long time management and retention of any landscaping is achieved.
- The proposed substation search area is located to the south of the Dedham Vale AONB and therefore may adversely contribute towards its setting. For this reason, the proposed substation design, which at submission are far from being fixed, together with its location needs to be carefully considered.

Yours sincerely,

 {Signature}

  
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