

Our Ref: Five Estuaries  
Date: 21 June 2024  
Enquiries to: Isaac Nunn  
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BY EMAIL

For the attention of the case team

[FiveEstuaries@planninginspectorate.gov.uk](mailto:FiveEstuaries@planninginspectorate.gov.uk)

Dear Sir/Madam,

## **FIVE ESTUARIES OFFSHORE WIND FARM DCO APPLICATION RELEVANT REPRESENTATIONS**

Thank you for the notifications that the Planning Inspectorate has accepted the above application and that interested parties have until 21 June 2024 to submit Relevant Representations. Please therefore accept this letter as a response from Suffolk County Council ("the Council") to the Planning Inspectorate's request.

The Council notes the recent changes to the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015, which mean that Relevant Representations are now required to be "where practicable, the full particulars of the case". Because the Council expects to be invited to submit a Local Impact Report ("LIR") in due course, it should be noted that full technical details of the Council's case will necessarily follow in the LIR.

Notwithstanding the above caveat these Relevant Representations set out, as fully as is practicable, the Council's case in the following paragraphs:

### **Offshore Centred Approach**

1. The Council has a 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.
2. The Council does note that the promoter has identified this project, together with the promoters of North Falls, Nautilus and Lion Link, as being within the Early Opportunities workstream of the Offshore Transmission Network Review, and that there are ongoing discussions between these parties and National Grid Electricity Transmission ("NGET"), under the auspices of the Department for Business, Energy and Industrial Strategy and Renewables UK.
3. The Council believes 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 Council.

4. The Council has separately made objections to NGET's Norwich to Tilbury project on the basis that it does not adequately demonstrate why greater offshore co-ordination would not be feasible to avoid or significantly reduce the need for that project. As noted above, this proposal is reliant upon the Lawford substation, which is part of the Norwich to Tilbury project, for its own connection to the National Grid network. Whilst onshore development to deliver that connection falls in Essex rather than in Suffolk, the socio-economic and highway impacts of that inshore development are more widely spread and will also affect the local road network and communities and business in Suffolk. To that extent, the Council also has concerns about this project's reliance on an onshore connection and on a component part of the Norwich to Tilbury project.

## **Landscape and the National Landscape Area**

5. At the previous statutory consultation stage, the Council believed that the promoter may not have adequately addressed the potential harm on the Suffolk Coast & Heaths National Landscape.
6. As part of our previous representations, the Council commissioned White Consultants to provide an update addendum to their 2020 report into Suffolk Seascape Sensitivity Study to Offshore Wind Farms.
7. The 2020 study did not take into account the parameters of the Five Estuaries project. Subsequently the update addendum was published in June 2023.
8. In general, larger wind turbines both in terms of overall height and diameter of tower and swept path have a larger magnitude than smaller wind turbines at the same distance. Therefore, larger buffers for larger turbines are reasonable.
9. The percentage of time visibility is possible over long distances and the aspect of the east coast both increase the likelihood of visibility of turbines beyond 40km.
10. Turbines over 400m high should be at least 40km away from the coast and preferable more as set out in the buffers in 4.17 of the update addendum. If the nearest wind turbines of any given array are around 40km away from the national landscape coast, it is highly desirable for the number around this distance to be minimised in order to avoid significant adverse effects on the national landscape and curtaining effects on the skyline in excellent visible conditions.
11. It is noted that the proposals as submitted to PINS offer two scenarios:
  - a) 41 wind turbines up to 399m high at 37km off the Suffolk coast; or
  - b) 79 wind turbines up to 320m high at 37km off the Suffolk coast.
12. The Council have assessed the potential effects of the maximum height wind turbines (399m) at 37km and as set out within the parameters of the update addendum, believes that there will not be a significant effect on seascape and landscape or the Suffolk Coast and Heaths National Landscape Area.
13. The Council will remain engaged in landscape and seascape to ensure that the values of the Suffolk Coast and Heaths National Landscape are considered and taken into account.

## **Community Benefit and Project Legacy**

14. Community benefits should be in addition to the required secondary mitigation for the development, including those based on any emerging requirements in the anticipated consultation on Community Benefits foreshadowed in the British Energy Security Strategy, which is expected to be consulted on imminently.
15. The Council encourages the promoter to consider such community benefit options and would be happy to discuss how community benefit suitable for the locality could be incorporated. It considers that, given the visual impacts on the Suffolk coast, an element of community benefit should be considered for those communities affected.
16. The Council also encourages the promoter to consider legacy opportunities of all elements of their development.

## **Socio-Economic and Skills**

17. There is an absence of consideration to several key documents and sources of data that will enhance the provided socio-economic assessment. These include the Economic Strategy for Norfolk and Suffolk, the Technical Legacy Report for Norfolk and Suffolk along with the Council's Energy Infrastructure Policy.
18. The Council cannot fully determine the sufficiency of the approach to determining socio-economic impact ahead of the levels of expected employment, and the detailed workings supporting it, being provided and assessed by the promoter. The Council consider further work to be required by the promoter, including clearly setting out the expected number and nature of employment opportunities during each phase of the project. These employment opportunities need to be related to the expected availability of labour in the area.
19. The promoter's commitment to prepare and implement an Employment, Skills and Education Strategy is welcomed and the Council would be willing to work with the promoter to ensure that there is alignment between the strategy and ongoing local activity supporting education, skills and employment to ensure that the strategy can have as great an impact as possible. This would be in line with the Council's energy infrastructure policy which requires promoters to undertake comprehensive and effective engagement with the Council and supply chain partners to maximise the local business opportunity, skills inspiration and employment benefits.

## **Tourism**

20. The Council anticipates that the project, given its location close to the Suffolk Coast & Heaths National Landscape Area and Dedham Vale National Landscape Area and other rural areas of Suffolk of importance to the tourism economy, could have impacts upon visitor perception, and visitor numbers, both during construction and during operation, which, in particular in combination with other projects happening simultaneously in the area, could be significant.

## **Traffic and Transport**

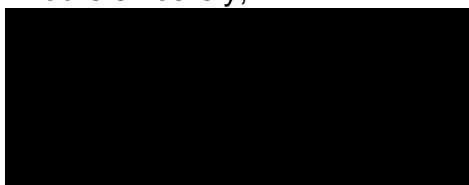
21. The Council expects traffic and transport impacts to be fully assessed and mitigated, for Suffolk especially in regard to any potential construction traffic impacts on Suffolk's rural road network and the limited options for suitable HGV and Abnormal Intervisible Loads (AIL) routes once the Norwich to Tilbury route alignment has been chosen.
22. If any AILs originate from Suffolk, the Council would need to be consulted at an early stage to identify the work required to facilitate this.
23. The Council will need to be satisfied that there will be no disruption or delays caused by the project on the A12 or wider strategic road network which may then have an impact on businesses in Suffolk.
24. There should be an Outline Port Construction Management Plan provided to manage traffic impacts that arise at any port as a result of the offshore elements of the proposal.
25. Decommissioning and removal routes also need careful consideration.
26. We may have further specific comments on HGV movements to the proposed ecological compensation site at Orford Ness.

## **Cumulative Impacts**

27. Given the number (approximately 5 NSIPs reaching statutory consultation stage in 2023/24) of Nationally Significant Infrastructure Projects and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with the other projects is particularly important.
28. There is a lack of reference to the potential impact on businesses and supply chains of other construction projects in the local area and region due to additional workforce displacement and churn resulting from the project.
29. The Council welcomes the commitment from the promoter to undertake an assessment of 'whether it is considered likely that the cumulative effect indicates a loss of benefit as a result of cumulative projects, or an enhancement of opportunity which would help to develop expertise and capacity in the market'.

30. The above assessment should include consideration of other infrastructure projects, not just offshore wind farm projects, and identify how any mismatch between supply and demand can be addressed. This cumulative effect assessment would also need to be considered in determining the feasibility and consequential impact of securing a greater contingent of local work force and lowering the number of works needed from beyond the boundaries of the WSA (both positive and negative, including a consideration of displacement and high levels of labour churn in the wider economy).
31. The construction period for this project is predicted to occur during the middle of the construction period for Sizewell C Nuclear Power Station. It is anticipated that there would be significant cumulative pressure on the available workforce. This could reduce the opportunities to securing any skills and employment legacy from the construction workforces as the projects would be occurring in parallel.
32. The Council expects the promoter to develop a demonstrable understanding of the wider development environment for their project, and to work with the Council and other promoters to manage and mitigate these impacts.

Yours sincerely,



**Isaac Nunn**  
**Senior Planning Officer (NSIPs)**  
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Suffolk County Council