



The Five Estuaries Offshore Wind Farm project (EN010115)

Babergh District Council submission to procedural deadline 2

This is the submission of Babergh District Council to deadline 2 of the examination for the Five Estuaries Offshore Wind Farm project (EN010115). It includes out Babergh District Councils' Local Impact Report, expanding on those issues identified in the Relevant representations submission of Babergh District Council to the examination (APP-009), and Babergh District Council's responses to ExQ1.

Items included in this submission:

- 1. Babergh District Council Local Impact Report**
- 2. Babergh District Council response to ExQ1.**

1. Babergh District Council Local Impact Report (LIR):

Introduction

- 1.1 Babergh District Council is principally concerned with the potential visual and landscape impacts of the onshore elements of the proposed development on the landscape of Babergh District including the Dedham Vale National Landscape and its setting. This LIR submission focused therefore solely on those matters.
- 1.2 The key onshore elements of Five Estuaries (5E) include the proposed Onshore Substation (OnSS), onshore Export Cable Corridor (onshore ECC) and the landfall (where the offshore export cables will meet the onshore export cables).
- 1.3 Babergh District Council is concerned that there is the potential for residual adverse visual impacts from the Onshore Substation on the setting of the designated Dedham Vale National Landscape, due to its scale.
- 1.4 In addition, there are concerns that the cumulative effects of 5E with the proposed North Falls onshore substation, the East Anglian Connection Node (EACN), and the pylons that are proposed to connect to it from the Norwich to Tilbury (N2T) scheme would have a significant cumulative effect.
- 1.5 The N2T pylons do not appear to be identified in the cumulative Landscape and Visual Impact Assessment but form an essential element to enable this development.

Substation

- 1.6 The proposed Onshore Substation represents a significant negative feature in the local landscape during construction and in the early years post-construction, being up



to 15m in height and occupying up to 58,000m², the equivalent of approximately eight full scale football pitches.

- 1.7 The Dedham Vale National Landscape is shown as being as close as 2Km from the project substation operational boundary and includes areas of Higher Theoretical Visibility. Small areas of Higher Theoretical Visibility also occur within the Suffolk Coast and Heaths National Landscape but beyond 5 Km distance (Fig 2.10b Landscape Designations and screened ZTV).
- 1.8 Figure 2.11b Viewpoints and Screened ZTV shows that the only viewpoint selected within the Dedham Vale National Landscape is Viewpoint (VP) 9, Essex Way, Dedham Road. (Figure 2 24 a-c), within Tendring District Council's boundaries. The applicant has provided a wireframe 3D box in the visualisations to mark the maximum physical extent that the onshore substation would occupy to ensure the 'worst-case scenario is covered in the assessment'. The wireline does not include for the cumulative effects of the proposed pylons that would connect to the EACN.
- 1.9 From VP9, the substation is not likely visible from ground level. The lower half is shown screened by landform and the upper by existing vegetation. VP9 is located in an area of Lower Theoretical Visibility rather than Higher Theoretical Visibility, however, and there is an argument that an additional or alternative VP is taken just to the east or west of the existing VP9, but more within the area of Higher Theoretical Visibility. Further commentary as to how this exact location was chosen would be useful.
- 1.10 In addition, there is an argument that an additional VP assessment is provided at 5Km distance from a public point somewhere close to Orvis Farm, Orvis Lane or clapper Farm to demonstrate the effects, or lack of effects, from within Babergh District Council boundaries. If searches for potential viewpoints have been made by the applicant in this area, some commentary to that effect in the LVIA would be useful.

Cumulative effects:

- 1.11 The applicant quotes GLVIA3 in the Environmental Statement, Vol 6, Part 3, Chapter 2 which defines cumulative landscape and visual effects as those that 'result from additional changes to the landscape and visual amenity caused by the proposed development in conjunction with other developments (associated with or separate to it), or actions that occurred in the past, present or are likely to occur in the foreseeable future.' However, it is unclear that all associated or separate development or actions likely to occur in the foreseeable future have been included.
- 1.12 The Environmental Statement, Vol 6, Part 7 Annex 2.1: Landscape and Visual Impact Assessment Figure 2.13 Cumulative Developments identifies EACN as Cumulative Development 3, however it does not identify the pylon run as part of that proposal on the plan.
- 1.13 The only viewpoint selected within the Dedham Vale National Landscape, (VP) 9, Essex Way, Dedham Road does not show the pylons as part of the cumulative visual effects (Figure 2 24 c). Table 2.12: Cumulative Developments identifies EACN but not the pylons exiting to the west as part of N2T.



Conclusions

1.14 Babergh District Council requests that the applicant provides additional viewpoint assessment (s) and visualisation(s) from inside the Dedham Vale National Landscape, somewhere north of the Stour Valley Path on the higher ground, exact location to be agreed in order to demonstrate that residual visual effects do not occur.

1.15 They further request that the full visual effects of the Norwich to Tilbury project proposals are assessed for their potential negative effects on the settings of the Dedham Vale National Landscape.

2. Babergh District Council responses to ExQ1

Reference	Question to	Question	Local Authority Answer
GC.1.10	LPAs	<p>Development Plan policies</p> <p>Confirm whether you are content with the Applicant's policy analysis. The local planning authorities in responding to this question should also advise on whether there have been any changes to the Development Plan operative in their respective areas following the submission of the Application for the Proposed Development and/or as to whether any changes are anticipated prior to 17 March 2025 the latest date by which the Examination must be completed.</p>	<p>The applicant's Policy Compliance Document APP-232 does not refer to the Babergh and Mid Suffolk Joint Local Plan 2023.</p> <p>The policies of this document are material considerations in the determination of this application.</p> <p>In particular, the ExA's attention is drawn to policies LP18 and LP25</p>
GC.1.11	LPAs	<p>Neighbourhood Plans</p> <p>Are there any relevant made or emerging neighbourhood plans that the ExA should be aware of? If there are, please:</p> <p>a) Provide details, confirming their status and, if they are emerging, the expected timescales for their making.</p> <p>b) Provide copies of the relevant parts of any made plan or emerging plan.</p> <p>Indicate what weight it is considered the ExA should give to these documents.</p>	<p>East Bergholt NP made 2016</p> <p>https://www.babergh.gov.uk/documents/d/babergh/east-bergholt-np-july16</p> <p>Including policies EB6 and EB9</p> <p>Full weight</p> <p>Stutton NP made 2023</p> <p>https://www.babergh.gov.uk/documents/d/babergh/stutton-np-adopted-july23</p> <p>Including policies SN9 and SN13</p> <p>Full weight</p>
GC.1.12	LPAs	<p>Updates on other development</p>	<p>The Norwich to Tilbury NSIP is considered to be at a sufficiently advanced stage to be reasonably foreseeable in a Vanguard sense and, as such, all</p>





Reference	Question to	Question	Local Authority Answer
		Provide an update on any planning applications that have been submitted or any permissions that have been granted following the submission of the Application for the Proposed Development which could either affect the Proposed Development or be affected by the Proposed Development and whether those developments would affect the conclusions reached in the Environmental Statement (ES)	elements of that development, including pylons and overhead lines, should be considered in the assessment of cumulative effects for this project.

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