

Babergh District Council submission to procedural deadline 1

This is the submission of Babergh District Council to deadline 1 of the examination for the North Falls Offshore Wind Farm project (EN010119). It consists of Babergh District Councils' Local Impact Report, expanding on those issues identified in the relevant representations submission of Babergh District Council to the examination.

Items included in this submission:

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 elements of North Falls project include the proposed Offshore Wind Farm, the 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 North Falls with the proposed Five Estuaries 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.
- 1.6 This response is made with primary reference to document AP-044 3.1.32 Environmental Statement Chapter 30 Landscape and Visual Impact Assessment, and documents AP-083 to AP-088, 3.2.26 Environmental Statement Chapter 30, Figures Part 1 to 6



Substation:

- 1.7 Babergh District Council are concerned that there is the potential for residual visual impacts both during construction and during operation from the Onshore Substation on the National Landscape or its setting, due to its scale.
- 1.8 This is of particular concern given that there is now a strengthened duty to 'seek to further' the statutory purpose of National Landscapes. It is considered that the Onshore Substation could undermine that statutory purpose and insufficient evidence has been provided to demonstrate that this duty has been complied with.
- 1.9 The Dedham Vale National Landscape is shown as being within 2km from the project substation operational boundary. There is an area of theoretical visibility from the southern edge of the National Landscape.
- 1.10 The proposed Onshore Substation represents a significant negative feature in the local landscape during construction and in the early years post-construction, with the maximum onshore substation equipment being up to 18m in height and the platform footprint occupying up to 58,800m2, the equivalent of approximately eight full scale football pitches.

Cumulative Effects:

- 1.11 There are concerns that the cumulative effects of North Falls with the proposed Five Estuaries 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 residual adverse cumulative effect on both visual receptors, the National Landscape or its setting.
- 1.12 The N2T pylons do not appear to be identified in the cumulative LVIA visualisations, and therefore it is assumed they haven't formed part of the LVIA cumulative impact assessment itself. The pylons will form part of the DCO for the Norwich to Tilbury project, along with the EACN so their cumulative impact needs to be considered.
- 1.13 Babergh District Council would expect to see compensation offered for any residual visual effects in line with National Policy EN1 Paragraph 4.1.5 'In considering any proposed development... the Secretary of State should take into account: its potential adverse impacts...including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy' (Our emphasis)



Conclusions:

- 1.14 Babergh District Council expect to see compensation offered for any residual visual effects.
- 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 setting of the Dedham Vale National Landscape.
- 1.16 It should be demonstrated that the project has sought to further the purpose of the Dedham Vale National Landscape, given the strengthened duty under section 85 of the Countryside and Rights of Way Act 2000.

Other:

1.17 We are in contact with the developer to agree the Statement of Common Ground and expect to submit this to the examination at a later date.

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