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Dear Mr Eaton,

**Proposed application by Five Estuaries Wind Farm Limited for a Development Consent Order for the proposed Five Estuaries Offshore Wind Farm, an extension to the operational Galloper Offshore Wind Farm located off the Tendring Coast, Essex.**

Tendring District Council (TDC) has been working with Essex County Council (ECC) to provide technical input into the full planning process for the Five Estuaries development and this response should therefore be considered in conjunction with representations from Essex County Council – including comments on the Preliminary Environmental Information Report (PEIR).

The proposed route corridor for this project assumes a 132kV underground connection will be made to the proposed East Anglia Green 400kV Norwich to Tilbury powerline and a new substation in the Lawford/Ardleigh/Great Bromley area. It is also assumed that a separate customer sub-station serving the Five Estuaries development is likely to be located close to the new 400kV substation.

Tendring District Council along with all other authorities in Essex and many in Suffolk and Norfolk has previously made representations to National Grid raising strong objections to the East Anglia Green proposal. With these objections in mind, this Council cannot support any proposal to connect the Five Estuaries Offshore windfarm to the electricity network via the proposed East Anglia Green substation.

It is the clear preference of this Council, along with many others in the region, that the East Anglia Green powerline should have an offshore centred approach. This would enable the connection of the Five Estuaries Offshore Windfarm without the need to

pass through and beneath land in Tendring – avoiding the severe damage, complication and disturbance it would cause.

The Council considers this application for a DCO is premature because it is wholly predicated on the draft proposals for East Anglian Green obtaining consent, despite the fact that East Anglian Green has not yet reached statutory consultation stage and there are serious objections to that proposal that have not yet been resolved. The Electricity Supply Office (ESO) is currently conducting a review of the EA Green project to identify alternative options, which include the consideration of offshore routes to address the capacity issues. These will be assessed in terms of benefit and cost for each option. Until this review is complete TDC is unable to support the current proposed Five Estuaries extension.

If the outcome of the review recommends the EA Green project goes ahead in its current proposed form, the corresponding DCO application is successful, and ergo the Five Estuaries extensions are deemed able to proceed then TDC will rigorously seek to ensure the best outcomes for the District and the success of the project. In particular, this Council will pursue measures to minimise the environmental impact and disturbance to residents and maximise the prospect of local job creation and other local benefits to soften and mitigate the substantial harm that is clearly going to be caused.

## **OFFSHORE**

The Tendring coastline has existing offshore windfarms, this Council does not object to the offshore elements of the proposals which are an extension of what is already in place.

Indeed, the Council recognises the great benefits of offshore wind – not only in the generation of clean energy in the face of a climate emergency, but also in the provision of jobs in the construction, maintenance and servicing of the turbines and the potential for Harwich to play an important role in supporting that industry.

It is the onshore implications that are of greatest concern to the Council. From Tendring District Council's perspective, it firmly believes that much greater consideration should be given to an offshore powerline route that would avoid the need for the cables to make landfall through / under the SSSI and LNR designations. Whilst the grounding of the cables through the SSSI / LNR would bring about temporary disruption that could be mitigated over time, it would also cause significant damage to the area and greatly affect the tourism industry during the construction period.

These issues could all be resolved through a route around the coast as suggested in this and previous responses. The Council will not accept the need for the onshore elements of the Five Estuaries scheme until such time that the alternative offshore route has been properly considered and duly discounted through a full and transparent process for East Anglian Green.

## **ONSHORE**

There are a multitude of concerns that TDC has in relation to the onshore elements – as have been raised by local residents, debated by elected Councillors and shared by neighbouring authorities and other partners.

As mentioned in previous responses, the prospect of the onshore elements of this project and generating considerable anxiety in our communities – namely the prospect of large-scale, intrusive physical on-shore infrastructure in the form of substations in sensitive locations and the disturbance and environmental impact of development along the route. These relate as much to the construction phases as they do to the operational phase.

The proximity of the development and associated construction activity to homes genuinely runs the risk of undermining public support for off-shore wind and other means of generating clean, renewable energy. This could be damaging to the government's ambitions around zero carbon and the fight against climate change which is of imperative importance to all residents and future generations.

With regard to the location of the proposed substations, Tendring District Council is still concerned about the potential land-take and height of these structures. The poor road access, via narrow country lanes will be irreversibly damaged during the construction process and will cause significant disturbance to a rural community where the road infrastructure is not designed to accommodate such activity. These concerns are magnified by the fact that the clustered option means two other substations, including the 400kV East Anglia Green substation might also be located within close proximity – completely transforming the character and enjoyment of this relatively untouched part of Tendring's rural heartland.

The Council, as previously stated, is extremely concerned about the health risks posed to residents within proximity to electro-magnetic fields - as demonstrated through considerable research and peer-reviewed scientific data in relation to childhood cancer. There will be considerable noise emanating from substations - again raising concern about proximity to people's homes. The sterilisation of agricultural land along the route of the underground power connections seems to have been given little weight in consideration of the preferred options for both East Anglian Green and, consequently, this project – which could be avoided through achieving an offshore solution.

These significant landscape concerns mean there is a clear need for landscape impact and mitigation plans in respect not only of the SSSI and LNR at landfall, but also along the length of the route through the district to either of the proposed substations. The Council appreciates the outline in Volume 5 Annex 4.14 VE approach to Biodiversity Net Gain and encourage increases that exceed the current 10% national requirements. The long term commitment (30yrs in line with BNG regs), to the planting around the substation is supported and should be replicated for all other areas of planting that occur as a result of the project. TDC would welcome the inclusion of other stakeholders, such as Essex Wildlife Trust, Farming Wildlife and Agriculture Group when long term discussions on planting maintenance are taking place with landowners along the route. Opportunities to assess any positive contributions that can be made to the Local Nature Recovery Strategy should be assessed.

If the Council's objections to the scheme are ultimately unsuccessful, TDC insists on there being meaningful dialogue with the promoter – Five Estuaries, to consider a Community Benefit Contribution package for the legacy of the project. There are

several community projects that would benefit from funding. A priority for TDC will involve seeking reinforcements to the sea defences and the cycle routes for the affected areas. There are costed community projects within the district that require funding (Jaywick being just one example), TDC would be happy to share these at an appropriate time. There is however, a much longer term view whereby the ongoing benefits to Five Estuaries and associated shareholders can be used as part of the social, environmental and corporate responsibility to improve a wide range of community assets.

TDC requests further conversations with the promoter with regards to the socio-economic impacts of the scheme. Given the level of economic investment involved for Five Estuaries we would like to progress the economic benefits in the form of training a local work force in the relevant areas. As well as the longer term commitment to apprenticeships for those who are near completion of their higher education and looking to enter the workforce. At present the Volume 3 Annex 3.3 Socio-Economic, Tourism and Recreation of the PEIR deals with the existing labour market and distribution of jobs within those sectors, further detail on specific schemes that will benefit the employment prospects of the current working and future working population would be of great interest to TDC.

At present Tourism is a major part of the District economy. As such we would expect to see a full outline of how the impacts on tourism will be mitigated. The PEIR Volume 3 Annex 3.3 Socio-Economic, Tourism and Recreation cites potential impacts on the identified sites as 'negligible'. The Council disagrees strongly with this view – as the disturbance not only to the coast and the wider countryside, particularly in the construction phase, will be significant. The tourism industry relies on good trade and repeat custom achieved during a relatively short window of opportunity in the summer months and the works proposed as part of this project will have a substantial impact.

TDC expect this to be monitored and further work carried out as necessary, as sites at landfall are popular destinations. The cumulative impacts of the entire project on the transport infrastructure, in particular any challenges around heavy plant traffic impact across the proposed routes at busy times of the year. Again whilst these are assessed in detail in PEIR Volume 3 Annex 3.8 Traffic and Transport, seasonal increases as a result of tourism will need to be looked at extremely carefully and mitigated as required.

Taking the wider view of all proposed NSIP projects within the Tendring ( EA Green & North Falls Offshore Wind Farm), the Council would expect to see an assessment of the cumulative impacts with other schemes. Both at land fall, along the route and the approach towards the substation in the north of the district - in particular with consideration toward the Dedham Vale AONB.

To summarise, in the absence of an off shore centred approach TDC would expect to work toward the following points with Five Estuaries;

- Long term commitment to apprenticeships and permanent employment

- Establishment of a Community Benefit Contribution package
- Fully mitigated proposals to address the impact of the entire project in environmental terms, including but not limited to ecology, visual landscape, Biodiversity Net Gain and the ongoing maintenance
- Fully mitigated proposals to deal with the impact of construction on tourism within the District
- Fully mitigated proposals addressing the impacts on residents – both physical and mental) in the immediate vicinity of construction and the substations
- Fully mitigated proposals with regard to the impact of construction on the highways along the route and at the substations
- Fully mitigated proposals with regard to the impact of this project and the in-combination impacts of North Falls and East Anglia Green.

If you require further information on any of the matters raised, please contact the case officer, their details are set out below.

Yours Sincerely



Gary Guiver

**Director of Planning**

**Tendring District Council.**

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Policy Team

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