

29 Sept 2025

Email: fiveestuaries@rwe.com &
contact@northfallsoffshore.com

Dear Sirs,

Tendring District Council response on the joint design guide consultation for the North Falls and Five Estuaries substations

Below is Tendring District Council's response to the consultation. Each section presents the original question from your consultation document, followed by our response in italics, with additional comments provided at the end.

1. What are your views on the suggested approach to the design of buildings that would be located within the substation compounds?

Tendring District Council remains deeply concerned about the visual and environmental impact of large substations within this predominantly rural and agricultural landscape. All associated buildings should be designed to reflect the character and appearance of agricultural structures found locally, rather than drawing on architectural precedents from unrelated regions, areas further away, or unrelated contexts.

We strongly advocate for a design approach that genuinely embraces the local vernacular—specifically the form, materials, and scale of agricultural buildings in the vicinity. This would help ensure that new structures are sympathetic to their surroundings and reduce the visual intrusion on the landscape. In TDC's view, this locally grounded approach represents the most appropriate and respectful design strategy.

2. What are your views on the suggested approaches to the materials for the buildings that would be located within the substation compounds?

Tendring District Council considers it essential that any buildings within the substation compounds are designed with materials that enable them to blend seamlessly into the surrounding rural landscape. The choice of materials should be guided by a clear commitment to minimising visual impact and respecting the character of the local environment.

From the information submitted to date, it remains unclear how this objective will be achieved in practice. However, TDC acknowledges that carefully considered steel-framed structures with appropriately coloured metal cladding may offer a practical and visually unobtrusive solution—provided it is sensitively designed to reflect the tones and textures of nearby agricultural buildings. This approach could help ensure the buildings are recessive in the landscape and consistent with the local vernacular.

3. If it is possible to reduce the size of either substation compound, where do you feel the reduction area(s) should be?

Tendring District Council believes that if a reduction in the size of either substation compound is feasible, priority should be given to reducing the overall width of the compounds. A reduction in width would help to limit the horizontal spread of development across the landscape, thereby reducing visual intrusion and preserving more of the surrounding open character.

This approach would be particularly beneficial in mitigating the impact on key views and maintaining a sense of scale that is more appropriate to the rural setting. TDC encourages the developers to explore this option in detail and to provide clear justification for the proposed dimensions, including any opportunities for meaningful reduction.

4. Do you have a preference on the colours being considered for the buildings that would be located within the substation compounds?

The Council believes that any colour palette selected for buildings within the substation compounds must be carefully chosen to ensure the structures blend as seamlessly as possible into the surrounding landscape. The effectiveness of this integration will depend not only on the colours themselves but also on how they interact with the proposed landscape mitigation measures throughout the changing seasons.

At present, the submitted documentation does not clearly demonstrate how the proposed colour options will perform in relation to seasonal variation or the broader visual context. As such, it is difficult to express a definitive preference. However, on balance, TDC considers the 'Landscape Subtle' palette to be the least visually intrusive and most likely to harmonise with the rural setting—provided it is applied with sensitivity to local conditions and planting schemes.

5. Do you have a preference on the colour application methods being considered for buildings that would be located within the substation compounds?

See answer to question 4 above.

6. Do you have a preference on the fencing type and colour options being considered for the secure boundary to the substation compounds?

Tendring District Council considers fencing design and placement to be a critical aspect of the substation compounds, both in terms of visual impact and practical land management. Given that the proposed landscaping is likely to increase the local rabbit population, appropriate rabbit-proof fencing should be incorporated to protect adjacent farmland. Importantly, the responsibility for maintaining such fencing must rest with the developer or site operator—not with neighbouring landowners or farms.

Fencing should be positioned at a reasonable distance from any planting to ensure that planting schemes can be properly maintained by the relevant parties (e.g., FE and NF), without relying on access through third-party land. Under no circumstances should fencing be placed within hedgerows, as this would severely hinder maintenance and pose a risk to local wildlife by disrupting established habitats and movement corridors.

7. Do you have a preference on the fencing types being considered for the perimeter boundary to the wider substation sites?

TDC considers timber post-and-rail fencing to be the most appropriate option for the perimeter boundary of the wider substation sites (obviously where prevention of access to area is not an overriding objective of the fencing). Post-and-rail fencing is both aesthetically pleasing and widely used throughout the immediate and surrounding rural area, making it a familiar and sympathetic choice within the local landscape.

Its traditional appearance complements the agricultural character of the setting and helps to minimise visual disruption. TDC encourages the use of this fencing style as a default approach, unless specific site constraints require alternative solutions that can be demonstrated to offer similar landscape sensitivity.

8. What are your views on the planting and species proposed across the substation sites?

TDC supports the use of a diverse mix of native species across the substation sites, with a strong emphasis on those that are resilient to heat and dry conditions, wildlife-rich, and low-maintenance. Planting schemes should prioritise ecological value while remaining practical, be effective in providing the necessary screening, and sustainable in the long term.

TDC supports the use of native hedgerows, provided they are planted in a way that allows for straightforward maintenance and integrates effectively with the surrounding landscape. These hedgerows should be designed to enhance biodiversity while remaining practical for routine upkeep.

However, TDC is not convinced that maintenance considerations have been adequately addressed in the current proposals. For example, the 20-metre-wide strip along Ardleigh Road, east of Normans Farm, appears to be entirely enclosed by fencing. This raises serious concerns about how access will be achieved for ongoing maintenance within this landscaped area. It is unclear how routine tasks such as hedge trimming, weed control, or replanting will be carried out, and more broadly, who will bear responsibility for these activities.

TDC urges the developers to clarify access arrangements and long-term maintenance responsibilities to ensure that landscaping schemes remain viable and do not place undue burden on neighbouring landowners or third parties.

It is essential that planting does not obstruct access to ditches or compromise the ability to carry out regular ditch clearance. Unrestricted access to these areas is critical for effective drainage and flood prevention. Any planting proposals must be carefully coordinated to ensure that ditch maintenance remains feasible and that landowners are not burdened with additional responsibilities.

9. How do you currently use the area in and around the proposed substation sites? Are there opportunities to support how communities use the area, once the substations have been built?

TDC recognises that the area in and around the proposed substation sites is highly valued by the local community. It is regularly used by people of all ages and abilities for walking, cycling, horse

riding, and other forms of outdoor recreation. These routes and open spaces contribute significantly to the wellbeing, connectivity, and identity of the local area.

Any loss of access, amenity, or recreational value resulting from the development must be fully offset through the provision of new and enhanced facilities. This includes ensuring that alternative routes and open spaces are safe, accessible, and inclusive for all users—young and old, able-bodied and disabled alike.

There is a clear opportunity for the developers to work collaboratively with the community and local authorities to deliver meaningful improvements that support continued public use of the area post-construction. These could include new permissive paths, improved bridleways, accessible green spaces, and community-led landscaping features that reflect local needs and aspirations.

10. Additional Comments on the Design Guide:

TDC Additional Comments on Joint Design Guide Proposals

1. **Lack of Integrated Thinking Across Sites** *The guide treats the two substations as isolated entities—understandable given the involvement of separate companies—but greater effort should be made to harmonise their design language, environmental strategy, and community interface. Despite their proximity and shared context, there are limited cohesive ecological or landscape frameworks linking the sites.*
2. **Weak Biodiversity Commitments** *Biodiversity proposals are vague and lack species lists, or long-term management plans. The guide does not explain how enhancements will be monitored or maintained, raising concerns about greenwashing. For example, the isolated ‘moustache’ strip north of Normans Farm appears ineffective in delivering meaningful biodiversity gains within an active agricultural setting. We are not convinced that this strip will be effective in respect of screening either.*
3. **Landscaping: Functional but Uninspired** *In some areas the landscaping focuses heavily on visual screening and security, with limited attention to placemaking, ecology, or recreation. Along Ardleigh Road, screening appears to compromise farming operations. TDC urges collaboration with landowners to balance visual mitigation with safe field access, crop yield, and planting heights that avoid excessive shading. The guide also misses opportunities to use landscape design for community engagement and education.*
4. **Fragmented Infrastructure Planning** *The substations are presented as standalone projects, with no reference to wider energy infrastructure, landscape /biodiversity corridors (or how what is proposed could link up with future landscape planting for other proposed infrastructure projects), or indeed longer-term regional development strategies/future Local Plans. This fragmented approach undermines cumulative benefits and reinforces perceptions of poor planning.*
5. **Missed Opportunities for Innovation** *The guide lacks ambition in exploring sustainable design features such as green roofs, PV panels, living walls, or multifunctional landscape buffers. There is no mention of renewable energy integration, educational signage, or interpretive features that could foster public understanding and goodwill. The proposals fail to reflect the urgency of climate adaptation or the potential for substations to contribute to local environmental resilience.*

Yours sincerely

Jacob Jaarsma

Planning Policy Officer

Tendring District Council.

Enquiries to: Jacob Jaarsma
Policy Team

jjjaarsma@tendringdc.gov.uk