

Scottish Power Renewables
East Anglia TWO
RTLY-RLGH-GKSE FREEPOST,
25 Priestgate, Peterborough,
PE1 1JL

20 March 2019

Dear Sir/Madam,

**East Anglia Two Offshore Windfarm Phase 4 Consultation
Statutory Pre-Application Consultation under Section 42 of the Planning Act 2008**

1. Introduction

I am writing on behalf of the Suffolk Preservation Society (SPS) in response to the current Phase 4 round of consultation relating to the Preliminary Environmental Impact Report (PEIR). SPS acknowledges the contribution that renewable energy will make towards securing the Nation's future energy needs and accepts that projects such as these will be delivered. Notwithstanding this position, SPS's charitable objects are to campaign to protect and promote the special landscape and heritage of Suffolk. We aim to achieve this by ensuring that the landscape and visual impacts of these proposals together with those of EA1(N), National Grid and Sizewell C are fully identified, critically assessed and properly mitigated. We are therefore disappointed that the consultation pays insufficient regard to the enormity of the combined effects of EA1(N), EA2, National Grid substation and Sizewell and fails to provide communities with the necessary information to demonstrate the scope, extent and harmful environmental impacts of the combined schemes.

In summary:

- SPS calls for an offshore ringmain to obviate the need for onshore substations by providing a long term, sustainable solution to the delivery of electricity from the North Sea zone to the National Grid. This has been previously tabled by a number of Statutory Consultees, and was noted by Claire Perry The Minister for Energy and Clean Growth (Hansard Volume 656, 11 March 2019);
- SPS objects to the inadequate information provided regarding the impacts of offshore and onshore elements on the cultural heritage and landscape value as evidenced by the PEIR, including an absence of any assessment of the offshore impacts on the heritage coastline and in particular the AONB;
- SPS objects to the choice of Friston for the onshore substations will result in significant harm to the landscape and designated and undesignated heritage assets;
- SPS objects to the absence of trial trenching prior to submission of the DCO in areas of known archaeological sensitivity;

- SPS objects to the lack of analysis of the cumulative landscape and heritage impacts of EA1(N) with EA2, National Grid substation and Sizewell C. Clarification is required on the impacts on the special qualities of the AONB and its setting, including the cumulative HGV and other vehicular movements during the construction phase of the offshore and onshore infrastructure.

2. Offshore infrastructure impacts

2.1 Visibility and illumination

The documentation is vague, overly simplistic and lacks sufficient detail to fully understand the anticipated off shore visual impacts of the development. The Technical Summary at para 161 states that the wind turbines are likely to only be visible to the public 33% of the time under conditions of excellent visibility. Clarification is required on whether this refers to all daylight hours and whether this will vary throughout the year. In addition this likely period of visibility must also be taken in context of the public wishing to benefit from and enjoy this seascape character during the same periods of ‘excellent visibility’ rather than periods of poorer visibility. Therefore the actual resulting impact will be much greater than just the proportion of time of visibility.

Furthermore, it would be disingenuous to imply that the illuminated turbines will not be visible during the hours of nightfall. It is essential that the assertions over the visibility of the turbines from the coast, made in the technical summary, can be fully evidenced. At an early engagement meeting SPS was specifically advised by SPR that the offshore array would not be illuminated other than on the four outer corners of the windfarm. However, the visualisations clearly show that all turbines are illuminated, LVIA chapter 28, Visualisations Viewpoint 4 Southwold figure 28.29g, Viewpoint 2 Kessingland Beach figure 28.27f and Viewpoint 1 Lowestoft figure 28.26f. Based on these visualisations and the wording within chapter 6 para 6.5.5 it is fair to conclude that the lighting will be on throughout all hours of darkness, ‘flashing simultaneously’ and creating what can only be described as a potential ‘seaside illumination’ effect where there is currently none. Clarification is required regarding the hours and style of illumination.

Finally the PEIR remains silent on the location and visual impact of the two off shore platform structures that are required to service the wind turbines. Clarification is required to address this issue.

2.2 Impacts on the AONB

The consultation relates to development proposals adjacent and outside the Area of Outstanding Natural Beauty (AONB) but will have an impact on the AONB. The Countryside and Rights of Way Act 2000 (CROW Act) sets out the protection afforded to AONBs and the duty on decision makers to conserve and enhance its natural beauty. The Natural Beauty and Special Qualities Indicators V1.8 21 Nov 2016 established, in agreement with the AONB Partnership and EDF Energy, that these indicators include: landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage. The impact on these indicators, which have been agreed with EDF, is relevant to the offshore elements of SPR’s proposals and requires assessment.

The Suffolk Coast and Heaths AONB and the Heritage Coast is one of the most important parts of Suffolk, from a landscape and natural beauty perspective but also plays a vital economic role. The total tourism value in the AONB was over £210 million pounds, with a total of 4 million visitor trips (day and staying) and total tourism related employment standing at 4655 jobs, which is significant in a predominantly rural county (Economic Impact of Tourism in the Suffolk Coast and Heaths AONB 2017). The proposals would have a significant and harmful impact on the value of the AONB to many of its residents and businesses (who trade on the natural beauty and special qualities of the area).

The proposed windfarm of 75 turbines is to be located 32km from Southwold and measure up to 300m to the tip of the blade with a diameter of up to 250m and will be the largest turbines ever erected worldwide. The windfarm will extend over 255km along the Suffolk Heritage Coast and will be visible from Covehithe in the north to Orford Ness in the south. The LVIA (Chapter 29) shows that the visual impacts upon the AONB will be significant and permanent. However, the Technical Summary fails to reflect the magnitude of impact and fails in its conclusions to make any reference at all to the AONB. SPS considers that SPR has a duty to consider the purposes of the nationally designated AONB for these developments as outlined in DEFRA's guidance note (the relevant section is reproduced below from the DEFRA publication Product code PB 10747 REV 1/07):

Additionally, it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas.

SPS considers that the proposed development of two windfarms within the setting of the AONB would cause significant harm to the AONB. The proposals would introduce significant built development offshore that would be of an unprecedented scale as well as being animated and illuminated. Significant and unacceptable impacts on the AONB characteristics will result, most notably on its seascape quality, scenic quality, relative wildness, relative tranquillity and cultural heritage qualities. The intrusion into views of the seascape from the AONB and the negative impact on long views along the coastline is unacceptable in the nationally designated AONB. We object to the impacts on the AONB landscape which will go to the heart of the purpose of the designation.

2.3 Heritage impacts from offshore development

Settlements along the Heritage Coast include numerous heritage assets which historically and functionally relate to the sea and derive their significance from their relationship to it. It is therefore necessary to consider the potential impact on the setting of designated heritage assets both in daylight and during the hours of darkness when illuminated.

The Cultural Heritage Chapter (28) of the PEIR does not include an assessment of the impacts of the offshore element of the project on the heritage of the coastline. Aldeburgh, Southwold, Orford, South Lowestoft and Dunwich are all designated conservation areas which are characterised by their coastal location and relationship with the sea and make important contributions to the special qualities of the AONB. For example: sea defences such as Aldeburgh Martello tower; Southwold and Orford Ness lighthouses; Covehithe and Walberswick churches, St Bartholomew's Church Corton which has received a grant from the MHCLG Coastal Revival Fund with the view to

restoring the church tower as a coastal viewing point; sea resort architecture including the House in the Clouds at Thorpeness; and other domestic architecture such as Marine Villas in Southwold that have been designed to capture views of the sea. Furthermore, the conservation areas along the Suffolk coastline also have key views that need to be fully identified and assessed in order to properly quantify the cultural heritage impacts of the offshore development. It is crucial to consider the impact on the setting of these heritage assets and coastline both in daylight and during the hours of darkness when the turbines are illuminated. In view of the conclusions of the LVIA Chapter 29 - that the impacts upon the AONB will be significant - it is surprising that the project can have progressed this far without due regard being paid to this key area of environmental impact. Clarification is therefore required regarding the potential impacts upon the setting of heritage assets.

3. Onshore infrastructure impacts

3.1 Heritage impacts

The SPS has been pleased to participate in the Cultural Heritage and Archaeology Expert Topic Group. It is gratifying to note that the setting assessment has now been extended to 1km from the earlier 500m and we consider that this will give a more accurate assessment of the impacts on heritage. Having considered the heritage assessment we affirm our position that the final list of heritage assets identified for further assessment is inadequate and limits the assessment of onshore assets to a meagre 6 listed buildings: Friston Church, Little Moor Farm, High House Farm, Woodside Farm, Friston House and Aldringham Court. The ETG gave thorough feedback on other assets that must form part of the assessment and we welcome SPR's confirmation that The Post Mill and the Friston War Memorial will now be included in the heritage assessment. However we object to principle of the final selection of substation site before undertaking a detailed assessment of the effects on the significance of the heritage assets.

As also discussed during the recent meeting with SPR, post publication of the PEIR, SPS wishes to reaffirm that multiple viewpoints from Grove Road across the landscape toward Little Moor Farm and High House Farm and looking south on the PROW toward the church must be included within the heritage assessment. These are key viewpoints across an historic rural landscape that in all probability has remained substantially unchanged for centuries, and will be obliterated if the substation goes ahead. Visualisations from these viewpoints are essential to correctly record and illustrate the impact on the setting of those heritage assets.

The impact of the 16m wide tree loss associated with the cabling at Aldringham Court will result in permanent harm to the setting of this asset. Despite raising this from a very early stage the assessment of the proposed works on the setting of the asset is still outstanding. In the absence of this crucial piece of work to determine heritage harm it is not possible to consider how those impacts can be mitigated.

It is also noted that the heritage assessment has excluded consideration of any potential impacts from the proposed offsite highway modifications. Without further information it is not possible to assess the extent of any impacts, but a number of listed buildings may be affected at both the A12 River Ore bridge strengthening and the Farnham junction improvements. Clarification of the impacts is required and therefore these should be included in the final heritage assessment study.

3.2 Substations location and associated infrastructure

SPS's position is one of seeking a coordinated and strategic approach to deliver the next generation of energy infrastructure across the Suffolk Coastal Belt to prevent irreversible harm occurring to the character of the region. SPS calls for an offshore ringmain to obviate the need for onshore substations by providing a long term, sustainable solution to the delivery of electricity from the North Sea zone to the National Grid which will not progressively erode the landscape quality of Suffolk. Where an onshore approach is sought we call for a co-locational approach in order to minimise the harm to the landscape and maximise any effective mitigation. This position is consistent with our approach at the EA3 Public Examination in accepting the co-location of infrastructure at Bramford, which at that time also included for the additional facilities for EA2 and EA1(N). The SPS remains convinced that the Friston site is not supportable, being a relatively unspoilt rural landscape, offering vistas worthy of being protected and retained for future generations to enjoy.

3.2.1 Selection of Friston

3.2.1.1 Character of Friston The combined site area of the proposed substations is approximately 12 hectares with proposed structures of a maximum of 18m in height. The SPS is strongly opposed to the selection of the Friston site which is complex as a result of its limited size, deeply rural character, bordered by a tiny village, bisected by footpaths and bordered by a regional cycle route. The interaction between residential amenity, cultural heritage and public amenity renders the site highly complex and in the opinion of SPS incapable of accommodating all three substations. The site is characterised by designated heritage assets, some of which are highly graded. The landscape character is open and gently rolling countryside which is of scenic value.

The site is a medieval landscape that, with the exception of the transmission line inserted in the late 20th century, retains much of its historic rural character. Map regression shows that the original common land known as Friston Moor included a number of 17th century farmhouses, and the parish church. All are still present, designated as heritage assets, and all continue to derive significance from their setting within the landscape. In particular, the parish church dominates the views across the landscape having clear intervisibility with the farmsteads. The gently rolling landscape is an intimate one, characterised by a series of footpaths that connect the people to its church and has done so for at least 8 centuries. Archaeological evidence confirms the medieval origins of the settlement with evidence of a deserted parish church to the north of St Mary's and a moated site at Little Moor Farm on the edge of Friston Moor. Friston is a classic example of a tiny, deeply rural community, which is intrinsically connected to its landscape. It is indeed a special place.

3.2.1.2 Landscape character sensitivity The Friston site has been assessed low for both landscape character sensitivity and visual sensitivity (Substation Site Selection Update Presentation and Summary of RAG Methodology documentation, released on the 18 October). Yet despite the level of existing screening provided in the local landscape, the construction of the onshore substation and National Grid substation are assessed as having **significant** visual effects on residents of Friston, people walking on the local public right of way network to the north of Friston (between Friston and Fristonmoor), residents of scattered rural dwellings near Friston, motorists travelling on the B1121 Saxmundham Road, to the north of Friston, and motorists/cyclists travelling on

Grove Road immediately passing the onshore substation and National Grid substation, between Friston and Grove Wood (LVIA chapter 29 page 68).

The PEIR assesses that there will be significant long term and permanent effects on the area north of Friston within approximately 1km around the on shore substations (page 80 Chapter 29 LVIA) with mitigation at 15 years (page 84). We support this conclusion but question whether the LVIA can be relied upon when it states that there will be no significant long term visual effects other than on view point 8 (Saxmundham Road, North of Friston), Viewpoint 9 (Aldeburgh Road, South of Friston) and at Grove Wood (Manor Farm) to northern edge of Friston.

As discussed during the recent meeting with SPR, post publication of the PEIR, SPS reaffirms that views from Grove Road across the landscape must be included within the landscape and visual impact assessment. Grove Road provides a series of viewpoints across an historic rural landscape that in all probability has remained substantially unchanged for centuries, and will be obliterated if the substation goes ahead. Visualisations from Grove Road are essential to correctly record and illustrate the impact on receptors which will include not just those driving along Grove Road but those walking along the road to connect with the network of footpaths either side of the road and cyclists using cycle route 42 from Snape to Bramfield.

We are also concerned that longer views from important viewpoints have not been identified or assessed. For example chapter 29 LVIA figure 29.9 Onshore substation ZTV (with visual receptors) includes the Sandlings Long Distance Walking Route but not Snape Maltings. We consider that the long views from Snape Maltings, particularly the upper floor of the concert hall, may be impacted and requires assessment.

3.2.1.3 Pylon realignment The realignment of the pylon line, including 4 sealing end compounds, will bring the wirescape closer to the heritage assets Little Moor Farm and High House Farm. This will have a significant unacceptable negative visual impact on the landscape and the setting of the heritage assets. No details are provided about the sealing end compounds which appear on the Indicative Landscape Mitigation Plan (but are not included within the key). There have only been minimal attempts to demonstrate the impacts of these and the overhead line realignment works on Friston as they do not appear in the Visualisations. Clarification is required on the visual impacts of these works.

3.2.1.4 Mitigation The indicative landscape masterplan shows large blocks of planting to the south and west of the Friston substation site. However the scale and nature of the planting shows no regard to the setting of heritage assets or the character of the historic landscape and we are concerned that it will, of itself, be harmful.

We are also concerned that the proposed water management zones and screen planting do not reflect the existing landscape character and would appear alien and disruptive. The deeply rural character with its landmark features of the church and the windmill will be irrevocably altered and adequate mitigation is limited by the physical constraints. Therefore against this backdrop SPS would expect that Gas Insulated options are advanced, which have a considerably smaller footprint (140m x 120m as opposed to the Air Insulated option at 140m x 325m) and provide a “wrapping” that is more visually palatable. Whilst the additional 3m increase in height compared to the air insulated variant must be carefully offset against the smaller footprint, on balance the Gas Insulated variant is preferable in terms of reduced bulk and a simpler silhouette.

3.2.2 Archaeology

The choice of Friston as the location for the onshore substation is located 9km from the landfall site at Thorpeness, making it the furthest of all the seven options that were considered as part of the site selection exercise. In addition the maximum width of the cabling is 32m, involving significant disruption and potential archaeological loss. An option closer to landfall would have obviated the extent of permanent heritage harm. It would also reduce the disruption and visual impact from undergrounding works, including the 6 potential 160m x 150m Construction Consolidation Sites along the cable route.

The LVIA shows that the impacts around Aldringham Court will be significant and permanent, including the loss of woodland. The Expert Topic Group has consistently advised that there is high potential for as yet unknown below ground remains, especially at the pinch point where the cable route crosses the B1122. Accordingly, it has been recommended that a systematic earthwork assessment was necessary pre determination so that the mitigation could be incorporated into the scheme at the design stage. The SPS maintains its position that trial trenching pre determination is necessary for those key areas of the scheme previously identified by the Expert Topic Group.

The technical summary at para 142 states that a Written Scheme of Investigation will be submitted with the DCO alongside the Environmental Statement. However, the mitigation strategy is reliant upon post consent. The SPS strongly objects to this approach and calls for appropriate levels of trial trenching pre decision. The call for upfront trenching has been rejected by SPR which raises serious concerns, in particular in fixed locations such as Aldringham Court and Friston, where there is little flexibility in the scheme. In addition there is a strong case for detailed archaeological investigation in the vicinity of St Mary's Church where there is significant potential for human remains.

4. Conclusion

Notwithstanding the detailed points raised above, the SPS calls for a more coordinated delivery of energy NSIPs in East Suffolk. We call for changes that can more effectively manage the associated infrastructure in a way that minimises the harm to our natural and built heritage, our landscapes and the communities who live within them. The current ad hoc approach which fails to consider the long term environmental damage and the cumulative effects is unsustainable and we are strongly opposed to schemes which do not give proper weight to identifying the injurious consequences and fail to adequately mitigate or, where necessary, compensate for them. SPS in supporting future renewable energy developments considers that an offshore ringmain solution is essential, or where an on-shore installation is proposed it must be collocated and capable of effective mitigation in order to minimise harm to the wider environment of Suffolk.

Yours sincerely



Andrew Fane OBE MA FCA

Chairman

Ccs:

Jess Tipper, Phil Butler - Suffolk Preservation Society

MPs: Therese Coffey, Dan Poulter, Peter Aldous, George Freeman, Norman Lamb

Substation Action Save East Suffolk group

Will Fletcher - Inspector Historic England

Suffolk County Councillors: Richard Smith, Andrew Reid, Russ Rainger, Graham Newman, Steve Wiles, Stuart Bird, Keith Patience, Steve Ardley, Michael Ladd, Jamie Starling, Jenny Ceresa, Craig Rivett, Melanie Vigo di Gallodoro, Caroline Page, James Reeder, Keith Robinson

Tony Fryatt - Portfolio Holder for Planning, SCDC

Simon Amstutz - AONB Partnership

Phil Watson - Suffolk County Council Landscape Officer

Abby Antrobus – Suffolk County Council Archaeology Officer

Robert Scrimgeour – Principal Conservation Officer, Suffolk Coastal

Liz Martin – Conservation Officer Waveney District Council

Eloise Limmer – Conservation Officer Suffolk Coastal District Council

Ian McKay – Scottish Power Renewables

Philip Rew-Williamson – Expert Topic Group, Scottish Power Renewables

Local Councils: Friston Parish Council, Leiston cum Sizewell Town Council, Aldringham-cum-Thorpe Parish Council, Knodishall Parish Council, Aldeburgh Town Council, Lowestoft Town Council, Southwold Town Council, Dunwich Parish Meeting, Walberswick Parish Council