

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

6 November 2018

Dear Sir/Madam,

## **East Anglia Two and One North Offshore Windfarms. Phase 3.5 Consultation Exercise – Substation Location Update**

### **Introduction**

Further to our previous consultation responses, I am writing on behalf of the Suffolk Preservation Society (SPS) in response to the current Phase 3.5 round of consultation and in particular relating to the Substation Location Update. As SPS has previously stated, we acknowledge the important contribution that renewable energy will make towards securing the Nation's future energy needs and fully accept that projects such as these will be progressed in some form or other. Notwithstanding this position, SPS's charitable objects charge us with a responsibility 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 are fully identified, critically assessed and where possible properly mitigated.

### **Co-location approach**

It is becoming more evident that in forthcoming years Suffolk will be hosting a significant proportion of the Nation's energy infrastructure. In addition to East Anglia Two and One North, this will include at least two interconnectors promoted by National Grid, the planned Sizewell C Nuclear Power Station and the recent Crown Estate proposals to extend the existing windfarms licences off the Suffolk Coast. This will singly and cumulatively require significant additional onshore infrastructure. Taking all of this into account SPS has come to an overall position that a more coordinated and strategic approach is necessary to deliver the next generation of energy infrastructure across the Suffolk Coastal Belt to prevent irreversible harm occurring to the character of the region. A co-locational approach is preferable in order to minimise the harm to the landscape and maximise any effective mitigation. This position is consistent with our approach at the East Anglia 3 Public Examination in accepting the co-location of infrastructure at Bramford, which at that time also included for the additional facilities for East Anglia Two and One North.

Therefore 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. Regrettably the character of the "natural beauty" of the landscape around the

Sizewell area has been irrevocably altered and, on balance, the visual harm of SPR's proposals may be more capable of effective mitigation at Sizewell than at Friston. SPS considers that by adopting a strategy based more upon co-location of energy developments, the opportunities for meaningful mitigation are greater and the cumulative impacts can be better managed.

Furthermore, the impacts resulting from the cabling can also be minimised as a result of the shorter distance from landfall to Broom Covert. The Friston site, being further away from the onshore arrival point, would involve significantly more disturbance to landscape, woodland both on and above and below-ground heritage assets. For example the loss of the mature woodland within the curtilage of the Grade II listed Aldringham Court (Raidsend) will cause harm to the setting of the heritage asset.

### **Principle of location within the AONB**

Whilst SPS fully understands and supports the purposes of AONB designation, the existing onshore infrastructure at Sizewell for both the Greater Gabbard and Galloper Offshore Wind Farms demonstrates that it has previously been deemed acceptable and permissible to develop onshore windfarm infrastructure within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). It is a matter of fact that the Galloper Offshore Wind Farm Public Examination Panel's Report to the Secretary of State readily accepted that the on-shore infrastructure could be sited within the AONB area without the need to establish any 'exceptional circumstances', although noting it could have a detrimental impact requiring appropriate design and mitigation proposals to be provided. This included the provision of an AONB Enhancement Fund. Clearly the same could be achieved for the current proposals at Broom Covert and, with appropriate mitigation applied, existing buffer zones could be retained and potentially enhanced.

### **Consultation documentation**

Within the existing consultation documentation SPS has noted that the photomontages do not provide comparable visualisations between the Broom Covert and Friston sites, with views of the former taken at shorter distances than the latter, resulting in a potentially misleading impression that the impacts at Broom Covert will be greater than at Friston. We note the absence of views of the Friston site from Grove Road and the PROW leading from Friston Church towards Grove Wood and would ask that they are provided for public consultation. Both locations will provide closer viewpoints which would be more comparable, in terms of distance, to those already included for the Broom Covert location.

SPS remains concerned over the appropriateness of the use of a RAG (Red Amber Green) analysis to pre-select/de-select sites. As discussed during the recent meeting with SPR, although we appreciate the principle behind the methodology it remains difficult to accept the findings. Currently SPS sees the RAG assessment as a rather crude and blunt instrument to base some fundamental decisions upon. Having now seen the Substation Site Selection Update Presentation and Summary of RAG Methodology documentation, released on the 18 October, we fail to understand how, for example, the Friston site has been assessed low for both landscape character sensitivity and visual sensitivity. This clearly cannot be correct or appropriate. Nor do we accept that a 500m impact zone is a suitable distance for assessment of potential harm to historic properties. There will undoubtedly be a resulting impact on the Grade II\* Friston Church and in

addition, we note a number of other listed buildings within Friston and along the cable corridor that require assessing more fully to establish the potential harm compared to other site locations.

### **Conclusion.**

As a non-statutory consultee, SPS would not support the adoption of Grove Wood, Friston as the potential location for a substation or associated infrastructure to be taken forward in any future Development Consent Order application on the grounds of its overwhelming detrimental harm to scenic, relatively untouched rural landscape and heritage. The increased length of the associated cable corridor will give rise to further harm to the countryside and to above, and potentially below-ground, heritage assets compared to sites closer to the point of cable landfall. SPS in supporting future renewable energy developments consider that co-location of on-shore installations must take place to potentially minimise the resulting impacts and harm to the wider environment of Suffolk.

We would be pleased to meet with yourself again to further explore these issues if you feel this would be helpful.

Yours sincerely,



**Fiona Cairns MRTPI IHBC**  
**Director**

Ccs:

Chairman Suffolk Preservation Society, Andrew Fane

Phil Butler, Suffolk Preservation Society

Jess Tipper, Suffolk Preservation Society

MPs: Therese Coffey, Dan Poulter, Peter Aldous

Will Fletcher, Inspector Historic England

Suffolk County Councillors: Richard Smith, Michael Gower, Stephen Burroughs, Michael Bond, Andrew

Reid, Guy McGregor, James Finch, Matthew Hicks

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

Richard Bull – 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, Southwold Town Council, Dunwich Parish

Meeting, Walberswick Parish Council

Substation Action Save East Suffolk group