

2 July 2018

Mr David Walker
Development Director
Scottish Power Renewables EA2 and EA1N
RTLY-RLGH-GKSE
FREEPOST
25 Priestgate
Peterborough, PE1 1JL

Dear Mr Walker

**East Anglia Two and One North Offshore Windfarms
Phase 3 Consultation Exercise – Indicative Onshore Development Area**

Further to our previous response to Phase 2, I am writing on behalf of the Suffolk Preservation Society (SPS) in response to the current Phase 3 round of consultation relating to the Indicative Onshore Development Area. 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 this forms part of the Government's low carbon energy strategy. As such SPS remains fully supportive of the general principle of renewable energy and accepts that there is a certain inevitability that nationally required projects, such as these, will be progressed in some form or other. However at the same time 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 the proposals are fully identified, critically assessed and where possible properly mitigated.

SPS is pleased to have been included in the Cultural Heritage Expert Topic Group, alongside statutory consultees, the District Council, the County Council and Historic England. Dr Jess Tipper, SPS trustee, has contributed to the work on behalf of the Society to ensure that the method statement for the assessment of the cultural heritage will be fully considered in the drafting of the Preliminary Environmental Impact Report and subsequent Environmental Statement. SPS welcomed this inclusive approach and has been willing to contribute to this important piece of work that we believed would be effective in protecting the archaeology and built heritage affected by these proposals.

However, the current round of consultation seeking views solely on option 7, the Friston site, raises serious concerns. SPS feels strongly that the process to arrive at this choice has been skewed by prioritisation of the AONB above all other considerations. It is not disputed that the statutory designation of the AONB affords a high level of protection, but it is also a matter of fact that Sizewell A and B and the associated pylon lines, together with other onshore infrastructure define and dominate significant parts of the AONB. It is also worth noting that the proposals for Sizewell

C will further materially and harmfully impact upon the special landscape qualities of the AONB. We must stress that we fully respect the position taken by Natural England and the Suffolk Coast and Heaths AONB Partnership who have properly sought to discharge their responsibilities by defending the AONB. Their position resisting further erosion by large scale infrastructure within the AONB is entirely consistent with their remit. Nevertheless, SPS's view is that the Friston site is one of significant scenic value, bisected with public footpaths and will materially impact the setting of the grade II* All Saints Parish Church and is therefore wholly unacceptable.

Therefore, as a body whose charitable objects are to protect and promote the landscape and heritage of the county, we cannot support this binary choice of protecting the AONB at the expense of large swathes of rural Suffolk. We fully support the reasoning of the District and County Councils and would argue that co-location of SPR's onshore infrastructure with existing large scale industrial landscape around Sizewell is both rational and logical. By adopting a strategy based 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 travelling a shorter distance. The Friston site is furthest away from the onshore arrival point and involves significantly more disturbance (approx. 10km) to landscape, woodland and heritage assets.

With reference to your request to comment on the photomontages and visualisations, we consider that it would be reasonable to assume that the viewpoints should have been determined (at least in part) by the results of the desk based assessment. Furthermore, we consider that a high level desk based assessment should have been undertaken for all proposed locations, to allow an informed choice to be made. However, with regard to the actual photomontages and the selection of viewpoints we defer to Robert Scrimgeour and Philip Watson of the District and County Councils and Will Fletcher of Historic England, who have greater familiarity with the locality.

In conclusion, the strategic role of Planning is to provide co-ordination of projects to yield the best environmental outcomes. As a non statutory consultee, SPS was excluded from the site selection meeting and therefore we remain unclear as to how the decision to choose site 7 at Friston was arrived at. However, it is clear from the preliminary visualisation material that the three proposed substations will take up more land than the existing small rural village of Friston. We are concerned that the site selection exercise has sought to legitimise a skewed process which has relied primarily upon the AONB designation as a determining criteria. SPS considers that the site selection approach is fundamentally flawed and that the work of the Expert Topic Group to fully take cultural heritage into account has been undermined. We also consider that the re-titled Expert Topic Group as Heritage Steering Group is cynical as the opportunity for heritage considerations to steer the site selection process has now been largely bypassed.

Whilst we were pleased to participate in the work of the Expert Topic Group we must stress that we do not, in any way, support the conclusions arrived at since the initial meeting of the panel on April 26 and we strongly object to the selection of site 7 at Friston.

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 Atrobus – 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

