

27 March 2018

Scottish Power Renewables EA2 and EA1N
RTLY-RLGH-GKSE
FREEPOST
25 Priestgate
Peterborough, PE1 1JL

Dear Sirs

**East Anglia Two and One North Offshore Windfarms
Public Consultation Exercise**

Introduction

I am writing on behalf of the Suffolk Preservation Society (SPS) further to your current round of consultation and our meeting with your Development Director, David Walker, on this latest phase of the East Anglia Offshore Windfarm project. 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 with 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 therefore aim to achieve this by ensuring that the landscape and visual impacts of the proposals are fully identified, critically assessed and where possible mitigated.

On this basis SPS's response centres on two fundamental themes, firstly the adequacy of the assessment of the visual impact from both projects and secondly, that maximum effort is taken by you to minimise these impacts, ideally by designing these out in the first instance or through appropriate mitigation.

Currently, the proposals will be visually intrusive in a highly sensitive location. The natural and built environment in this coastal belt is unique, remaining remarkably undeveloped and characterised by a strong sense of remoteness. This resultant tranquility provides both a quality of life for its residents and a major draw for tourists, being recognised by numerous designations to protect these special qualities including the designated Southwold Conservation Area, the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast.

Onshore Infrastructure

The proposed relocation of the National Grid substations from the original Bramford site to the Leiston/Sizewell area would appear to have been based primarily on economic grounds, not taking into account any resulting adverse environmental and visual impact. We would urge that a

comparison of the environmental impacts be undertaken to assess the magnitude of resultant harm. This must include an assessment of any cumulative impacts from additional infrastructure that may now be required from neighbouring projects such as Sizewell C and any potential interconnector grid connections with Europe, such as Nautilus.

We note that a number of preferred site locations have now been identified for further investigation. Clearly none of these locations are appropriate or compatible for such large scale industrial style development which will be uncharacteristic for the area and even more so if located in or close to the AONB. The reasons for designating the AONB is to conserve and enhance its 'outstanding natural beauty' and siting any substation complex in or adjacent to the AONB would fall well short of this. As we briefly discussed during our meeting, special attention must be made to the design and layout of these structures to minimise and/or effectively mitigate the visual impacts. We are unable to provide any further commentary on the individual sites until such a time that you have refined your site selection process to identify individual sites.

It is reasonable to request that a more strategic approach is taken for all future grid connections in this area; otherwise it is foreseeable that the landscape could become randomly blighted with a number of installations in close proximity to one another. We are pleased to have been informed, during our recent meeting, that National Grid has advised that any future reinforcement of the grid network in this area can now be achieved solely through re-cablings of the existing pylon network with 'super conductors'.

Offshore Infrastructure

The proposed wind farm is characterised by turbines of an unprecedented scale and will have a material visual impact upon the AONB and the Heritage Coast. At our meeting Jessica DeGrazia, SPS Trustee, succinctly and powerfully summed up the likely visual change to the coastline as 'tragic'. We are concerned that relying solely on static photomontages will underrepresent the visual impact of clusters of turbines. We consider that it is important that all future interpretations of the windfarm should allow the observer to experience the animated effects of the blades as they sweep the skyline and the associated flicker. Such impacts may be far reaching and must be taken into account while assessing the potential impact on setting of all onshore landscape features, including designations of the Southwold Conservation Area, AONB and Heritage Coast.

We would request that you adequately address this issue and demonstrate the likely visual impacts of the turbines during operation. SPS strongly recommends that you include animated visualisations at a number of locations to illustrate the effect of movement. In addition, technology could be employed, such as virtual reality headsets, to provide a "true" experience of walking along the beach line once the turbines have been installed. This suggestion is considered reasonable in these circumstances where the impacts will be of a magnitude matched only by the sensitivity of this stretch of Suffolk coastline.

During our meeting we were partly reassured that the need for aviation warning lighting could be minimised to significantly reduce the potential 'seaside illumination' effect by the provision of beacons only at the four corners of the array. We would welcome confirmation that this has been agreed with the aviation authorities.

Mitigation and the need for an environmental fund

As the project evolves, we will continue to make the case for a meaningful environmental fund to be established to partially compensate those local communities that will undoubtedly be impacted

upon and disrupted during the construction and lifetime operation of these projects. The potential cost of this significant infrastructure project to the local rural community, including the local tourist economy will be considerable. It is inequitable if these costs are not recognised and addressed in the form of an environmental fund.

Finally I would confirm that having considered your Statement of Community Consultation for these projects SPS does not have any further comments to make upon this document. We trust that you find these comments constructive and we look forward to working closely with you in this respect.

Yours faithfully,



**Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director**

Ccs:

Chairman Suffolk Preservation Society, Andrew Fane

Chair Suffolk Coastal District SPS Committee, Jo Rogers

MPs: Therese Coffey, Dan Poulter, Peter Aldous

Suffolk County Councillors: Richard Smith, Michael Gower, Stephen Burroughs, Michael Bond, Andrew Reid, Guy McGregor, James Finch, Matthew Hicks

Simon Amstutz - AONB Partnership

Phil Watson - Suffolk County Council Landscape Officer

Tony Fryatt, Portfolio Holder for Planning, SCDC

Local Councils: 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