

IP 20025669

September 2021

Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership post issue specific hearing 13 written submission

Suffolk Coast & Heaths AONB Partnership

This consultation response is made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership. The Partnership is made up of around 25 organisations which are committed to the purposes of the AONB designation, to conserve and enhance natural beauty. **For the avoidance of any doubt, some individual members of the Partnership are public bodies or statutory undertakers which have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.**

Simon Amstutz, AONB Manager, represented the AONB Partnership at the hearing.

The AONB is referenced on the agenda (reproduced in bold below) and the following written submissions follow oral comments at the hearing.

6. Suffolk Coast and Heaths Area of Outstanding Natural Beauty Cumulative Impact

- ***Adequacy of assessment***
 - ***Has sufficient weight been given to all of the defined qualities of the AONB?***

The AONB Partnership concur with Natural England's position as stated in its Written Representations that the assessment is helpful in that they confirm (particularly for the construction phase) that fundamental characteristics of the AONB would be significantly affected.

The AONB Partnership further share the concern of Natural England again expressed in their Written Representations that in the applicants LVIA Table 13.14 that the capacity of this area to continue to deliver the AONB's statutory purpose would be significantly compromised and across an area and more than to a limited extent.

The AONB Partnership consider that there is little in the construction and operation elements that would contribute to delivering the statutory purpose of the AONB.

The AONB Partnership broadly agree that weight has been given to the defined qualities of the AONB but note there are areas of disagreement relating to how those impacts affect the statutory purpose.

- ***Assessment of other plans and projects***
 - ***Will appropriate and proportional mitigation be secured within the project in respect of cumulative impacts?***

The AONB Partnership recognise that it is difficult for the applicant to assess cumulative impacts given the speed and number of other significant energy projects developing in the area.

The AONB Partnership does not consider that design measures alone for any individual projects, can adequately mitigate the cumulative impacts on the AONB. It notes that there will be places in the AONB where significant energy project infrastructure will be seen over a 360 degree view and will therefore detract from the experience of the AONB.

The AONB Partnership concurs with Natural England's view in its Written Representations that they do not consider that a suitably robust assessment has been undertaken on cumulative impacts from all project elements on nationally designated sites (SSSIs) and their notified features, which often form part of the AONB defined qualities.

The AONB Partnership concurs with Natural England's view that it does not believe that the design mitigation measures could adequately address the general cumulative effect of the power station with existing energy infrastructure on the landscape character of the AONB and on the delivery of its statutory purpose, in particular AONB Landscape and Scenic quality during construction and operation.

The AONB Partnership recognise local concerns about the apparent lack of strategic overview on the development of energy projects on the coast and the impact on the landscape and AONB in particular.

The AONB Partnership consider the lack of understanding, due to the different stages of development of other projects, of the cumulative impacts on the Suffolk coast and the AONB make the ability to provide appropriate and proportional mitigation for the cumulative impacts impossible.

Simon Amstutz

AONB Manager, On behalf of Suffolk Coast & Heaths AONB Partnership