

Suffolk Preservation Society
(10032117)

Written Representation

East Anglia Three Offshore Wind Farm
Project
(PI Reference EN010056)

July 2016

The Suffolk Preservation Society (SPS) is a non-political, independent, self-funding charity whose charitable objects are to “promote the conservation, protection and improvement of Suffolk’s physical and natural environment for the public benefit by ensuring any change is undertaken sympathetically and to the highest level of design and sustainability”.

As stated during the pre-examination consultation phase SPS’s position to East Anglia Three Offshore Windfarm remains in principle supportive of non-visual intrusive infrastructure through the use of undergrounding of cables. SPS are encouraged to see that adequate provision will have been made under East Anglia One to install cable ducting suitable to accommodate both projects and that once installation activities are completed at the Bawdsey ‘landfall site’ there will be no buildings or above ground infrastructure at this location. SPS also recognises that the use of the existing grid infrastructure at Bramford will, to a certain extent, minimise the need for additional above ground structures at this location with the exception of the need for a Converter Station, but as the applicant has also recognised this still will be a further significant development in this locality and its impacts are a matter for concern.

It has been demonstrated by the applicant that there is a concentration of designated heritage assets that will be affected, to varying degrees, by the Converter Station. Nevertheless SPS’s view is that the site has been materially harmed by the existing infrastructure and so the debate should now focus on whether adequate remediation through appropriate mitigation can be effectively achieved.

Clearly the extent and scope of the proposed landscaping will be fundamental to the adequacy of the final mitigation achieved. A significant element of which is reliant upon and integral to the delivery of East Anglia One mitigation, which SPS understands has yet to be finalised with Suffolk County Council. Therefore in the absence of any substantive detail of the additional mitigation proposed directly for East Anglia Three, there remains significant uncertainties and confusion.

This is where the dilemma occurs as there is insufficient detail available to define the visual appearance of the structure, the associated wirescape and the landscaping. Without this level of detail it is uncertain how effective this will be in mitigating the negative impacts. SPS has raised this concern within its Relevant Representation submission and is aware that the applicant intends to submit further documentation revising their current proposals to hopefully address this. Similarly the responses to a number of the Written Questions raised by the Examining Authority will also provide further clarification and assist SPS and other Interested Parties to come to a final position on the adequacy of the proposals for the Bramford Converter Station and its associated mitigation.

Until this information is available SPS feels unable to fully assess the adequacy of the applicant’s proposals and must take a stance that it the proposed impacts on the landscape

and wider historic environment of the Bramford site are unacceptable. SPS does not consider the landscape impacts of the scheme have been fully identified or adequately mitigated and believe that careful design and layout could further minimise some of the impacts.

SPS would seek guidance from the Examining Authority on how it intends to allow Interested Parties to further consider, analyse and respond to these amended proposals when they are made available.

As part of SPS's Relevant Representation a particular concern was raised around the appropriateness of adopting the East Anglia One Design Principles to this project. We would like to draw the Inspectors' attention to a previous National Infrastructure Project (Progress Power Station EN010060) with a similar 'energy substation element' which also initially proposed to incorporate the East Anglia One Design Principles. However, during that Examination the Inspector stated that in his opinion they were superficial and required further refinement to make them more meaningful for a key Development Consent Order document. Therefore, SPS remains concerned as to the appropriateness of the East Anglia One Design Principles for East Anglia Three. SPS are aware that a specific question has been asked of the Applicant and we await the response from the Applicant to determine whether this addresses our concern.

In the meantime SPS would like to see further specific detail contained within the Design Principles to provide reassurance about its scope and adequacy to deliver the required outcomes, these include:

- A clear commitment to undertaking the Design Review for the Converter Station and to actively engage with the local councils and residents on the detailed design and landscaping proposals.
- A Lighting Scheme developed that would control and minimise the artificial light emissions at the Converter Station.
- The adoption of non-reflective insulators to any above ground wirescape.
- The setting of security fencing behind the landscaping.
- Appropriate consideration to be given to the appearance and positioning of the kiosks (although of minor size) along the cable route to minimise any further visual impacts, however minimal, and that a requirement is included for a siting protocol is to be agreed with the local planning authorities.

Finally SPS wishes to continue to lobby for an appropriate environmental fund to compensate (in part) those that will be undoubtedly impacted upon and disrupted during the life of this project. SPS consider that the absence of any recognition of the impact from such significant infrastructure provision within small rural communities to be wholly unacceptable. The price paid by those communities for the benefit of the nation as a whole

is inequitable and SPS considers that this should be compensated in the form of an environmental fund.

The critical documents that SPS are waiting upon before it can fully review and assess the adequacy of the proposal for the Bramford Converter Station include:

- The Applicant's masterplan document relating to the visual mitigation proposed for all East Anglia projects connecting to Bramford.
- The Applicant's updated landscaping assessment for East Anglia Three, taking into account the revised East Anglia ONE substation design.
- Responses to the Examining Authority's Written Questions PN1, EL2, EL5, LH6, LH7, LH8, LH9, LH10, LH11, LH12, LH13, LH14, SE3

