

6 October 2016

East Anglia Three Offshore Wind Farm

Suffolk Preservation Society's Response to the Examining Authority's second written questions and requests for information

Question LH18: Further to comments contained within the SoCG between SPS and the Applicant [REP3-014], please comment on whether, following further review, it is considered that the Applicant's Schedule of Listed Heritage Assets accurately reflects all the listed heritage assets contained within the assessment Zone of Theoretical Visibility, and that the assessment methodologies for the cultural heritage and landscape and visual assessments are appropriate.

Response: Suffolk Preservation Society cannot fully endorse the Schedule of Listed Heritage Assets or agree that the approach taken by the Applicant to assess these is fully acceptable, however the supplementary submission by Babergh and Mid Suffolk District Councils (REP4-027) does provide a certain level of assurance that the effects of the proposed project upon designated heritage assets have been appropriately assessed. As such the Society does not wish to make any further representation on the methodology used, subject to our further comment in response to question LH20 below.

Question LH19: Further to the SPS comments contained within the SoCG [REP3-014] in relation to the conclusions of the Landscape and Visual Assessment (LVIA) and the adequacy of the proposed mitigation, please can SPS state its current position following review of the Applicant's OEI?

Response: Suffolk Preservation Society considers that the revised and updated LVIA is an acceptable assessment subject to recognition that:

- The assessment may have placed undue weight of the impact from EA1 infrastructure on the sensitivity of what will become the baseline landscape.
- The time for the on-site landscaping to become effective mitigation will be between 15 to 20 years rather than the stated 15 years.
- That the overall mitigation proposals still rely heavily on off-site planting that may or may not be achieved as this remains subject to informal agreement with local landowners.

Question LH20: Please provide any comments you may wish to make in regard to the paper submitted by Babergh and MSDC's [REP4-027] which addresses methodological issues arising from LVIA and heritage assessments.

Response: Suffolk Preservation Society is pleased that the local authority has undertaken an independent review of the assessment of the impact upon setting of a number of the designated heritage assets that could be affected through this development. We note that the Local Authority

has employed a recognised stepped methodology that the Society would endorse in these circumstances.

While we acknowledge MSDC's use of the orthodox methodology, we note however that this does not extend to a consideration of step 4 namely an exploration of ways to avoid or minimise harmful effects, such as the moderate changes to the setting identified on Tye Farm and Bullenhall Farm. The report moves straight to step 5, namely the formulation of conclusion that no harmful effects will arise from the development either singularly or cumulatively with other projects. Inevitably the quantification of magnitude of effects is subjective, but nevertheless we find it surprising that a development of this scale and with such potential cumulative effects does not warrant any off site mitigation of impacts to designated heritage assets for which the existing Section 106 off site mitigation clearly does not accommodate for. We therefore recommend that a time-limited environmental fund be provided for off-site mitigation for unanticipated impacts upon the setting of heritage assets, identified post construction.

