SUFFOLK PRESERVATION SOCIETY

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WRITTEN REPRESENTATION

SCOTTISH POWER RENEWABLES

EAST ANGLIA 1(N) AND EAST ANGLIA 2 OFFSHORE WINDFARMS

OCTOBER 2020

CONTENTS PAGE

1 SUMMARY

The Suffolk Preservation Society (the SPS) acknowledges 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. However, the SPS's charitable objects charge us with protecting and promoting the special landscape and heritage of Suffolk. We aim to achieve this by ensuring that the heritage, landscape and visual impacts of these proposals are fully identified, critically assessed and where possible mitigated.

Onshore impacts at Friston

The SPS has significant concerns regarding the impact of the selected onshore substation site at Friston on the historic landscape character and the setting of heritage assets. The SPS considers that the Applicant underestimates the contribution made by setting to the significance of heritage assets, relying upon a visual assessment, contrary to Historic England Guidance, which advocates a broader set of criteria including; noise, dust, vibration, light pollution and impact upon the historic relationship between assets. The SPS is also concerned by the inadequate assessment of impacts upon heritage assets during the construction and decommissioning phases, including the impact of increased traffic on the setting of heritage assets along the access routes. We also have concerns about the visualisations which are often highly selective and, in some cases, misleading, resulting in an under representation of impacts.

The SPS is concerned that the potential cumulative impacts of the seven identified connection points (EA1(N), EA2, NG, Galloper, Greater Gabbard extensions, SCD1 and SCD2), singly or in combination, have not been assessed. Friston has been identified as a strategic connection point and the SPS considers that the cumulative impacts of all current and proposed energy projects should be fully assessed as part of this Examination.

The SPS also considers that the scale and character of the proposals is incapable of mitigation and that the historic landscape character of the site has not been fully understood. Moreover, the proposed landscape mitigation at 15 years is over optimistic in view of the dry conditions in this part of East Anglia.

Offshore impacts on the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty

The SPS considers that the proposed development within the setting of the AONB will cause significant harm to its special qualities. The proposals would introduce significant industrial development offshore that would be of an unprecedented scale as well as being animated and illuminated. The intrusion into views of the seascape from within the AONB and the negative impact on long views along the coastline will be of such a magnitude that it will run counter to the purposes of the nationally designated AONB. **S**ignificant negative

impacts will result, most notably on seascape quality, scenic quality, relative wildness, relative tranquillity and cultural heritage qualities**.**

The SPS considers the proposed mitigation to achieve a degree of separation between the two developments is inadequate and only a reduction in height of the turbines could materially reduce the visual impacts upon the setting of the AONB.

2 INTRODUCTION

2.1 The Suffolk Preservation Society

The Suffolk Preservation Society (the SPS) is a non-political, independent, self-funding charity that was established in 1929. Its 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 possible".

The Society is a member of the Suffolk Coast and Heaths AONB Partnership and also represents the Campaign to Protect Rural England (CPRE) in Suffolk.

The Society benefits from a professionally qualified staff of RTPI and IHBC members and includes landscape, planning, heritage and archaeology professionals within its Board of Trustees who have contributed towards the drafting of this report.

2.2 The Proposals

This written representation is in response to the DCO applications from Scottish Power Renewables for the two proposed offshore windfarms; East Anglia One (North) (EA1N) which will comprise 67 no. turbines, up to 300 m high, located around 37km from the Suffolk coastline and East Anglia Two (EA2), which will be 75 no. turbines, again up to 300m high, located around 31km offshore. The proposed turbines will be the largest erected worldwide, will extend along the Suffolk Heritage Coast and will be visible from Covehithe in the north to Orford Ness in the south.

The DCO applications also cover the site for supporting onshore infrastructure at Friston, some 9km inland from the landfall site. The site will accommodate separate EA1N and EA2 substations, each measuring 36,100m^2 and a National Grid connecting substation of 44,950m^2. In addition to these a 1.7km access road is proposed, no.3 sealing end compounds, perimeter fencing, an additional 59m high pylon and overhead line realignment.

2.3 The SPS's position on renewable energy projects

The SPS acknowledges 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, the SPS remains fully supportive of the general principle of renewable energy and accepts that nationally required projects, such as these, will be progressed in some form or other within the county. At the same time, the SPS's charitable objects charge us with protecting and promoting the special landscape and heritage of Suffolk. We aim to achieve this by ensuring that the heritage, landscape and

visual impacts of the proposals are fully identified, critically assessed and where possible mitigated. The SPS has responded to all previous rounds of consultation on both the EA1N and EA2 projects. The Society also sat on the Heritage Expert Topic Group.

Within this written representation, **The SPS sets out its significant concerns regarding the impact of the selected onshore substation site at Friston, on the historic landscape character and setting of heritage assets, and the impact of the off shore turbines on the special qualities of the designated AONB landscape.** Unless specifically specified, The SPS's comments relate to both EA1N and EA2 projects. The SPS does not raise concerns regarding the impact of proposed undergrounds cable corridor, deferring to statutory consultees on this matter.

3 ONSHORE INFRASTRUCTURE

3.1 Overview of Friston substation site

The SPS's overriding concern is the **damaging scale of the industrialising effect on Friston of the onshore substations, supporting EA1N, EA2 and National Grid connections, together with sealing end compounds, additional pylons, overhead realignment and access road**.

Friston is a tiny rural village within a network of quiet lanes and public rights of way (PROWs) which has remained substantially unchanged for centuries. The area to the north of Friston has an intrinsic rural character which is defined by its historic landscape and vernacular buildings. The landscape character is open and gently rolling countryside which is of scenic value. It has a tranquil, relatively unaltered character, with relatively little modern development except for the overhead transmission lines. The interaction between residential amenity, cultural heritage and public amenity renders the site highly complex and in the opinion of the SPS incapable of successfully accommodating all three substations. The site is characterised by designated heritage assets, some of which are highly graded.

The site is a medieval landscape that, with the exception of the transmission line inserted in the late 20th century, retains much of its historic rural character. Map regression shows that the original common land known as Friston Moor included a number of 17th century farmhouses, and the parish church. All are still present, designated as heritage assets, and all continue to derive significance from their setting within the landscape. In particular, the parish church dominates the views across the landscape having clear intervisibility with the farmsteads. The gently rolling landscape is an intimate one, characterised by a series of footpaths that connect the people to its church and has done so for at least 8 centuries. Archaeological evidence confirms the medieval origins of the settlement with evidence of a deserted parish church to the north of St Mary's and a moated site at Little Moor Farm on

the edge of Friston Moor. Friston is a classic example of a tiny, deeply rural community, which is intrinsically connected to its landscape. It is indeed a special place.

3.2 Site selection process

The SPS has therefore consistently questioned the **site selection** process, which identified the Friston site as an appropriate location to host the required energy infrastructure to support EA1N and EA2, and considers that the red, amber, green (RAG) assessment as a crude and blunt instrument to inform this fundamental decision. The SPS disagrees with its conclusions, failing to understand how the Friston site has been assessed low for both landscape character sensitivity and visual sensitivity in the RAG analysis. We endorse the findings of the Michelle Bolger Expert Landscape Consultancy report, *Landscape and Visual issues relating to the Onshore Development at Friston*[1] which identifies a number of flaws and inconsistencies in the process and concludes that:

"*The findings of the RAG assessment are therefore considered to be unsound. They do not display good design in terms of siting and should not have been relied upon to inform the next stage of the substations site selection process. Due to the flawed site selection process, the substations and infrastructure are sited in a location where they would cause severe landscape and visual harm that cannot be adequately mitigated. Moreover, their location necessitates excessively long supporting infrastructure, including elements such as the permanent access road (1,700m) and the cable route (9km) both of which have their own landscape impacts".*

3.3 Cumulative impacts with other energy projects

The SPS considers that the DCO process should ideally be held in abeyance pending the outcome of the BEIS Inquiry into the co-ordination of energy transmission projects and the National Grid Electricity System Operator Offshore Co-ordination Project which is set to make a preliminary report in October 2020 followed by a detailed report in March 2021. In the absence of this preferred option the SPS considers that, at the very least, the Applicant, in collaboration with National Grid, must be asked to assess the cumulative impacts of the current and proposed energy infrastructure projects for the Friston area, including the impact of increased traffic including HGVs during the construction phase on the setting of heritage assets along the access routes. The SPS also calls for confirmation that the decommissioning phase of these projects will provide for all parts of the installation, including the substructure, to be removed and the landscape character fully restored.

During the interval between Scottish Power selecting Friston as a site for onshore infrastructure for EA1N and EA2, and submission of its DCOs, it is understood that National Grid has provided connection points to the grid for two interconnectors, Eurolink

[1] Michelle Bolger Expert Landscape Consultancy. Landscape and Visual Issues relating to the Onshore Development at Friston required for East Anglia One North/ Two offshore windfarms. Prepared for Substation Action Save East Suffolk (SASES) October 2020.

and Nautilus in the Friston area. Subsequently, it has been announced that the Galloper and Greater Gabbard wind farm extension, known as the Five Estuaries and North Falls Project, has also been offered a connection north of Friston. More recently the National Grid Ventures Project SCD1 has been offered a connection by National Grid at Friston, while its sister project SCD2 is on hold.

Historic England Guidance on setting Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) December 2017 states *When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that* ***developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation*** (my emphasis). The SPS considers that the cumulative impacts of the current and future energy projects in the Friston area must be fully identified as part of the process of comprehensively assessing the impacts upon the setting of heritage assets identified in the Environmental Statement. The SPS considers that the magnitude of heritage harm upon the identified listed buildings has the potential to render these assets unviable and thereby prejudice their long-term conservation.

It is clear that National Grid has identified Friston as a strategic connection point for future projects. The SPS is concerned that the potential cumulative impacts of the seven identified connection points, singly or in combination with each other, have not been assessed. As the Applicant's proposals represent a trigger for future multiple connection points it is important that the Friston site is carefully assessed for cumulative impacts at this stage. The quantum of future projects has the potential to give rise to a severe level of harmful environmental impacts that has the potential to destroy the character of the place and render the heritage assets unviable. A wider appreciation of Friston as a strategic energy hub is fundamental to an assessment of the heritage harm that the Applicant's proposals represent. Accordingly, the SPS calls for an overarching, co-ordinated masterplan for Friston to be presented by National Grid as part of this Examination.

3.4 Impacts on the historic landscape character

The Applicant's LVIA states that the landscape has a medium/ high sensitivity to development and that the magnitude of change will be high. The Michelle Bolger Expert Landscape Consultancy report equates this to a **moderate/ major or major adverse** impact, with which the SPS is in agreement. The Environmental Statement (Chapter 29 summary para 254 (APP-077)) assesses that landscape and visual effects on the Friston area will be significant, long term and permanent. Again, the SPS concurs but considers that **the assessment does not truly reflect the character or the historic significance of the landscape and the harm that will result.**

Such a large industrial scheme will not integrate with the existing landscape but will dominate the area in terms of siting, scale and massing. The proposed infrastructure would cause severe landscape harm to the character of the countryside; the landscape fabric; character of Friston village and the PRoW network. A substantial area of open and deeply rural countryside to the north of Friston will be lost. The existing historic pattern of irregular fields, which has little intrusion from modern development, will be destroyed and replaced with a utilitarian, industrial landscape.

The site to support these industrial scale structures, at around 40 hectares, will far exceed Friston village which is around 15.5 hectares. Moreover, the topography of the site will result in the development of structures of up to 18m high being at a higher level than the village. The result will be to overwhelm the village, permanently changing its character and completely altering the relationship between Friston and its rural setting. The scale of the development and its close proximity to the village will be evident in views out from the village, from the agricultural land to the north and on all highway approaches to Friston.

The loss of footpath 8, in particular, will have a damaging impact on the PROW network. It is an historic parish boundary and has provided a link between the village, its parish church and the surrounding farms for hundreds of years. Moreover, it currently affords clear views of the church tower and the village when approaching from the north which will be lost.

3.4.1 Viewpoints

The SPS considers that the Applicant's submission underrepresents the impact of the proposals on the landscape. **Key viewpoints are either lacking or fail to adequately represent the potential landscape impacts.** The SPS endorses the Michelle Bolger report which sets out a number of serious technical limitations with the submitted visualisations. It also suggests some additional viewpoints which are required to better illustrate the full impact of the proposals. In particular additional visualisations are required from viewpoints to the north of the church on footpath 8 to more accurately illustrate the impact of the proposals on the relationship between the church and the countryside. Moreover, visualisations from the churchyard to the front of the church are currently entirely missing. This is a public viewpoint from where visitors to the church are likely to experience the substation site within the landscape. There are also no viewpoints which illustrate the location of the proposed 1.7km access road to the site and therefore its impact on the character of the landscape cannot be assessed.

3.5 Cultural heritage impacts

It is generally accepted that once the landfall and cable route infrastructure has been completed it will have no further impact upon buried or standing heritage assets until the decommissioning phase. Therefore, the SPS representation focusses on the seven listed

buildings which have been identified by the Applicant as being affected by the substations. The designated heritage assets are:

Little Moor Farm (National Heritage List Entry No. 1215743) Grade II

High House Farm (National Heritage List Entry No. 1216049) Grade II

The Church of St Mary, Friston (National Heritage List Entry No. 1287864) Grade II*

Friston Post Mill (National Heritage List Entry No. 1215741) Grade II*

Friston House (National Heritage List Entry No. 1216066) Grade II

Woodside Farmhouse (National Heritage List Entry No. 1215744) Grade II

Friston War Memorial (National Heritage List Entry No. 1435814) Grade II

3.5.1 Methodology for judging value

Para 85 of the Environmental Statement, 6.1.24 makes clear that the methodology devised by SPR to assign value are not definitive and merely provide a provisional guide when it states that *The categories and definitions of heritage importance do not necessarily reflect a definitive level of importance of an asset. They are intended to provide a provisional guide to the assessment of perceived heritage importance, which is to be based upon professional judgement incorporating the evidential, archaeological, historical, aesthetic, architectural and communal heritage values of the asset or assets.*

On this basis, the SPS disagrees with the Applicant's professional judgement regarding the values ascribed to grade II buildings. The SPS considers that this approach artificially lowers the assessment of impacts upon the setting of the grade II assets affected by the onshore infrastructure proposals at Friston. Having made this point, the SPS has considered the Applicant's assessments, based upon their suggested methodology and make the following comments:

3.5.2 Assessment of contribution made by setting

The SPS consider that the Applicant's Environmental Statement consistently **understates the contribution made by setting** to each of the designated heritage assets impacted by the substation site, resulting in much lower assessments of the adverse heritage impact on each of these individual listed buildings than might otherwise be concluded. The assessment relies on a visual assessment of setting, and pays little regard to the guidance on the wider identification of setting presented by Historic England in their Historic Environment Good Practice Advice in Planning Note 3, with an emphasis on how the asset is experienced, and

factors which can affect setting include noise, dust, vibration, increased light and activity levels which can all affect how a heritage asset is experienced. The ES concludes (ES Appendix 24.7) that only visual changes would affect the setting of heritage assets and thereby harm their significance. The SPS fundamentally disagrees with this narrow conclusion. Many factors beyond purely visual are all capable of affecting the setting of a heritage asset as made clear by Historic England guidance

> *The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.* (The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) Part 1 Settings and Views)

The SPS disagrees with the ES which concludes that the impact on the setting of **Friston Church** would be an adverse effect of moderate significance. The scale, character and massing of the proposals would fundamentally destroy the setting of church. It derives significance from its landscape setting and the wide-ranging views from the footpath which would be profoundly altered by the proposals. The SPS considers that the Applicant has failed to understand the importance of the historic landscape character of Friston and the contribution that it makes to the setting of Friston Church separately and in combination with the adjacent heritage assets. We concur with the views of Dr Richard Hoggett[2] when he states *The full extent of the substation development would be highly visible from within the church and churchyard, and the change of character from a rural agricultural landscape to a industrialised landscape would have a significant detrimental effect upon the setting within which the church is experienced (*para 5.3.10).

The SPS disagrees with the ES which concludes that the impact on the setting of the **War Memorial** is an adverse impact of negligible magnitude. The SPS considers that this underestimates the impacts given that this commemorative structure is the focus of public gatherings. Furthermore, the front of the memorial (with inscription) on the south face results in people congregating and looking directly on to the development site. Therefore, as a place of congregation and remembrance, the SPS considers that the assessment of harm as negligible significantly underplays the impacts and fails to adequately recognise the sensitivity of the site. The SPS considers that the proposals would cumulatively give rise to a materially greater level of harm than has been identified.

[2] Richard Hoggett Heritage. East Anglia One North and East Anglia Two: Cultural Heritage Assessment. October 2020. Prepared for Substation Action Save East Suffolk (SASES)

We concur with the findings of Dr Richard Hoggett's report which in particular, highlights that the impacts on the setting of **High House Farm** are underestimated, and agree with his conclusions that the impacts are comparable to those identified by the Applicant at **Little Moor Farm**, namely an adverse effect of medium magnitude of impact with a moderate significance of effect rather than an adverse effect of minor significance as claimed by the Applicant. The SPS also consider that the Applicant's assessment of the impacts upon the setting of **Friston House** are underestimated. We concur with the conclusion of Dr Richard Hoggett's report which assesses the impacts upon Friston House as low magnitude of impact rather than negligible with an overall assessment of an adverse effect of minor significance.

We do not consider that the Applicant's assessment of impacts on **Woodside Farmhouse** accurately reflects the impacts upon significance of the heritage asset. The assessment disaggregates the impacts of the two substations, stating that the impact of EA2, which is furthest away from Woodside Farmhouse is less harmful than EA1N which is only 350m from the asset. The Applicant argues that the intervening distance between the substations renders the one furthest away from the asset (EA2) as causing less harm. While it may be logical to argue that in the absence of the intervening EA1N substation, the EA2 substation will result in a lower level of harm to the setting of Woodside Farm as a result of the spatial separation, it does not recognise that the cumulative impact of the combined effect of the proposals including realignment of the pylon line, the sealing end compounds, the access road and the National Grid substation will result in an increased degree of industrialisation of the wider setting of Woodside Farmhouse. The SPS considers that the Applicant's assessment fails to reflect the cumulative impacts of the two substations, (together with the National Grid substation and associated development). The SPS considers that the conclusions that the EA2 substation would result in an adverse impact of low magnitude and EA1N would be moderate underestimates the likely cumulative effects of the proposals upon the setting of Woodside Farmhouse. In this case, the SPS considers that the cumulative impacts render the level of harm of both substations to the setting of Woodside Farmhouse as an adverse effect of moderate significance.

Historic England guidance on cumulative impacts is clear with regard to cumulative assessment that its purpose is to identify impacts that are the result of introducing development into the view in combination with other existing and proposed developments and *the combined impact may not simply be the sum of the impacts of individual developments; it may be more, or less.* Para.36 The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). In this case the SPS considers that the cumulative impacts render the level of harm of both substations to the setting of Woodside Farmhouse as adverse of moderate significance.

The SPS does not disagree with the assessment of the **Friston Post Mill** as an adverse impact of minor significance. However, the SPS would like to point out that Friston Post Mill is a building at risk. English Heritage Guidance states that *When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306).*

3.5.3 Construction and decommissioning phases

The SPS is also concerned by the **inadequate assessment of impacts resulting from the construction and decommissioning phases**. Without this assessment the overall conclusions of the impacts of the proposals on heritage is fundamentally flawed. We concur with the view of Dr Richard Hogget's report, October 2020, when he states:

> *Although some, but by no means all, of the construction impacts will be temporary, they are still due to last for a period of several years and the proposed working area covers a significantly larger footprint than the operational phase of the proposed schemes. In many cases, the boundaries of the construction area lie in very close proximity to heritage assets, where they will arguably have a much greater impact than some of the later, operational phases of the proposed scheme. Concluding that there will be 'no impact' and dismissing the heritage impacts likely to be caused by the construction phase are set out in the preceding paragraphs of their own report demonstrates a clear failure on the part of the Applicant to adequately quantify and assess the heritage impacts across the full duration of the scheme. As a consequence, on the basis of the documents submitted to date it is not possible for an informed decision to be made about the overall heritage impact of the scheme to be made. (para 4.1.5)*

This is particularly relevant in the case of Friston Church that the Onshore Development Area shows that the verge immediately to the north of the churchyard is identified as a construction area. This will result in the immediate setting of the church and churchyard being impacted during the construction and decommissioning phases, for an unspecified period of many years, neither of which have been properly assessed.

3.5.4 Visualisations

The SPS consider that the submitted **visualisations to inform the predicted level of change** are highly selective and misleading. Some are from viewpoints which do not fully illustrate the impact whereas some key views are missing. The SPS consider that some viewpoints presented in the ES are either lacking or unreliable and do not inform the assessment in a

meaningful way. For example, ***Cultural Heritage Viewpoint 5 at Woodside Farm*** (found within APP-520) is positioned such that the views of the substation site are blocked by buildings.

The SPS considers that the ES assessment is flawed as it fails to produce viewpoints looking north from the footpath looking towards the church. Presumably this is because EA2 substation would eclipse all views of the church sitting within the landscape. Furthermore, ***Cultural Heritage Viewpoint 8 at Friston Churchyard*** (found within APP-520) does not adequately reflect views of the substations site which would be available from other locations within the churchyard and is particularly misleading as the viewpoint is located behind a small clump of trees when there are multiple open views from the churchyard and indeed from within the body of the church, where the nave windows are low and transparent and give clear views across the landscape including the development site. ***Cultural Heritage Viewpoint 1*** is considered to be misleading because it illustrates a view looking north towards the church from the footpath and shows the substations looking subservient to the church. However, the substations at 16m in height, will be considerably taller than the church tower and therefore will not be subordinate in height.

Furthermore, ***Cultural Heritage Viewpoints 3*** is taken from the public footpath 300m to the north west of Little Moor Farm and 100m north of High House Farm and fails to show any impact upon the designated heritage assets. ***Cultural Heritage Viewpoint 6 south of Friston House*** at a point which is lower than much of garden and grounds and is also taken from viewpoints that give limited views. It is notable that the viewpoints are not taken from the house especially as there are key views of the site from principal habitable rooms, including the master bedroom.

3.6 Mitigation measures

The Outline Landscaping and Ecological Management Strategy (OLEMS) includes an Outline Landscape Mitigation Plan (OLMP) which together form the basis of a Landscape Management Plan (LMP). The use of planting to screen the proposals is central to the strategy for mitigation of impacts of the substations. Assumed growth rates of 6.5m to 7.8m for core native woodland and 6.5m to 8.4m for the native screening woodland at 15 years seems to be overoptimistic given the climatic conditions in this part of the East Anglia, with very low levels of rainfall, however the SPS would defer to the county specialist landscape advisors for a definitive view on the actual expected growth rates.

The SPS considers that the effectiveness of the proposed mitigation planting is overly ambitious and the reliability of the supporting visualisations showing growth at 15 years is questionable. This is illustrated by ***Cultural Heritage Viewpoint 4*** **Little Moor Farm** which demonstrates that at year 15 the mitigation has had limited discernible effect and ***Cultural***

Heritage Viewpoint 5 High House Farm where the proposed planting has no material effect. In both cases the Applicant concedes that the mitigation will have no effect on Little Moor Farm and High House Farm. Furthermore, the SPS considers that the ***Cultural Heritage Viewpoint 5*** illustrates the ineffectiveness of the proposed planting and disagrees with the Applicant's assertion that this will effectively mitigate the impacts of the proposal.

In some cases, the mitigation being proposed is considered to be inappropriate. The proposed bund at over 20m in height which has been engineered to hide views of the substations will appear alien in the landscape. It will create further harm to this historic landscape by virtue of its scale and incongruous form. Furthermore, some of the blocks of tree planting will serve to impede views and further erode the former open landscape qualities of the agrarian landscape.

In summary, **the SPS does not consider that the significant visual and landscape impacts of the substations and associated infrastructure at Friston are capable of effective mitigation**. This is chiefly because of the chosen location and lack of micro-siting, which has resulted in a proposal that fails to respond to the grain of the landscape, the pattern of fields and hedgerows and indeed the proximity of the village of Friston. The selection of Friston demonstrates a lack of sensitivity to the character of the landscape and shows a total disregard for the visual amenity of Friston residents and all those who use the nearby network of footpaths and cycle routes.

The SPS fully endorses the conclusions of Michelle Bolger's Landscape Report and in particular supports her call for an enhanced landscape mitigation scheme that covers a significantly wider zone around the site and calls for a long term landscape compensation package that achieves: effective micro siting to minimise the footprint of the substation sites, maximises the area to permit significantly more sensitive landscape planting (along Grove Road and the northern section of the new footpath) with block planting together with replacement of missing hedgerows, while also delivering a landscape enhancement package that would provide a positive, beneficial legacy to the project for the local community.

4 OFFSHORE INFRASTRUCTURE

4.1 Impacts on the AONB special qualities

The DCO applications relate to offshore development proposals which are outside the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) but are considered to be within its setting and will therefore have an impact on the designated area. The AONB and the Heritage Coast is one of the most important parts of Suffolk, from a landscape and natural beauty perspective, but also plays a vital economic role. The total tourism value in the AONB was over £210 million pounds, with a total of 4 million visitor trips (day and staying) and total tourism related employment standing at 4655 jobs, which is significant in

a predominantly rural county (Economic Impact of Tourism in the Suffolk Coast and Heaths AONB 2017). The SPS has serious concerns that the proposals will have an **adverse impact on the special qualities of the AONB** to many of its residents and businesses who trade on the natural beauty and special qualities of the area.

The Natural Beauty and Special Qualities Indicators V1.8 21 Nov 2016 established, in agreement with the AONB Partnership and EDF Energy, that these indicators include: landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage.

The inextricable link between the land and sea is fundamental to the special qualities and enjoyment of the AONB and the open sea views are highly sensitive to the introduction of vertical, illuminated and animated structures. The SPS therefore considers that the proposed development of EA1N and EA2 windfarms within the setting of the AONB will cause significant harm to the AONB. The proposals would introduce built development offshore that would be of an unprecedented scale. The intrusion of these manmade structures into open sea skyline views of the seascape from the AONB and the negative impact on long views along the Heritage coastline will fail to further the purposes of the nationally designated AONB and significant impacts will result, most notably on seascape quality, scenic quality, relative wildness, relative tranquillity and cultural heritage qualities.

Cultural heritage forms a key component of the AONB comprising many historic sites along the coast. The Martello towers, the Southwold lighthouse and Orford Castle are examples of historic built structures which contribute to the special qualities of the AONB landscape and their uncluttered seascape setting makes a positive contribution to their significance. Similarly, the open seascape plays an important part in the significance of a number of coastal resort areas of Southwold, Lowestoft and Thorpeness which have been designated conservation areas in recognition of their cultural heritage value with high levels of architectural and historic character. Their relationship with the seascape is a key characteristic and the SPS is concerned that the introduction of arrays of turbines onto the skyline will have a detrimental impact on the experience of these designated heritage assets, particularly from the beaches.

The SPS therefore endorses The Alison Farmer Associates report, *SLVIA* [Seascape landscape and Visual Impact Assessment] *Review EA2 and EA1N Final Report*[3] which concludes that:

> *Wind turbines are not a special quality of the Suffolk Coast & Heaths AONB nor a key characteristic, and the proposed development would not further the purpose of designation. On*

[3] The Alison Farmer Associates report *SLVIA* [Seascape landscape and Visual Impact Assessment] *Review EA2 and EA1N Final Report.* Commissioned by the AONB Partnership. Available at https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/SLVIA-Review-EA2-and-EA1N-Final-Report-.pdf

the contrary, the proposed developments, either individually or cumulatively, would undermine the special qualities and perceptions which are a fundamental component of this nationally valued landscape.

4.2 Cumulative impact with future energy projects

Para.156 of the Technical Summary states *Cumulative impacts with other relevant projects (the proposed East Anglia ONE North project, Sizewell C New Nuclear Power Station and Sizewell B Power Station Complex) were assessed as being not significant.* The SPS strongly disagrees with this statement and considers that the cumulative impact of EA1N and EA2 with the energy infrastructure of Sizewell A and B, existing windfarms as well as the proposed Sizewell C will be significant as it will further undermine the remaining sense of relative wildness and tranquillity of the coastline. This will be particularly evident from Sizewell beach where receptors will be effectively surrounded by large scale energy infrastructure.

Furthermore, the SPS does not agree that the National Grid Ventures Interconnector projects (Nautilus, Eurolink, SCD1 and SCD2) and the Galloper and Greater Gabbard extensions should have been excluded from an assessment of cumulative impacts on the designated AONB landscape.

4.3 Mitigation measures

The degree of impact of the offshore infrastructure on the special qualities of the AONB is dependent not only on the distance of the turbines from the shore, but also on the height of the structures. The SPS considers that effective mitigation of the visual impacts on the AONB could only be achieved through a reduction in the height and number of the turbines. In relation to the Applicant's proposed mitigation of the visual impacts of EA2, we defer to and highlight the expert opinion in the Alison Farmer Associates report[4] which concludes that:

Whilst the SLVIA [Seascape, Landscape and Visual Impact Assessment] for the mitigated scheme shows a reduction in effect from viewpoints due to reduced lateral spread, this does not alter the fact that when taken in association with EA1N and Galloper, Greater Gabbard, EA2 will continue to cause a substantial 'curtain' effect of turbines on skyline views from the AONB and would not conserve and enhance its special qualities.

[4] The Alison Farmer Associates, East Anglia Two Comments of Mitigated layout for Examination. Commissioned by the AONB Partnership. Available at https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/EA2-SLVIA-Mitigated-Layout-Review-Final-Report-20200416.pdf

5 CONCLUSION

5.1 Onshore impacts

The SPS has serious concerns regarding the onshore impacts of EA1N and EA2 projects at Friston due to:

- the impact of the industrialising effect on the historic landscape character and setting of heritage assets at Friston
- the flawed site selection process which selected the Friston area to host the onshore infrastructure
- the lack of consideration of the cumulative impacts of all current and proposed energy projects, including the impact of increased traffic including HGVs during the construction phase on the setting of heritage assets along the access routes. This should be fully assessed as part of this Examination.
- the Applicant's underestimation of the contribution made by setting to the significance of heritage assets.
- the Applicant's reliance on a visual assessment, contrary to the Historic England Guidance, which advocates a broader set of criteria including; noise, dust, vibration, light pollution and impact upon the historic relationship between assets.
- the inadequate assessment of the impacts upon heritage assets during the construction and decommissioning phases
- the highly selective and, in some cases, misleading visualisations, resulting in an under representation of impacts.
- the scale and character of the proposals is incapable of mitigation and the Applicant's proposed landscape mitigation at 15 years is over optimistic

5.2 Offshore impacts

The SPS has concerns regarding the impact of the offshore infrastructure on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty:

- the proposals would introduce significant industrial development offshore that would be of an unprecedented scale as well as being animated and illuminated.
- significant negative impacts will result, and will cause significant harm to the special qualities of the AONB, most notably on seascape quality, scenic quality, relative wildness, relative tranquillity and cultural heritage qualities.
- the intrusion into views of the seascape from within the AONB and the negative impact on long views along the coastline will be of such a magnitude that it will run counter to the purposes of the nationally designated AONB.

- the proposed mitigation to achieve a degree of separation between the two developments is inadequate and only a reduction in height of the turbines could materially reduce the visual impacts upon the setting of the AONB.

SPS October 2020.