

3 February 2021

SPS Ref no: 20023705

Dear Sir,

Suffolk Preservation Society response to material submitted by Scottish Power Renewables on 15 January 2021 regarding East Anglia 1(N) and East Anglia 2 Off Shore Wind projects.

Landscape and Visual Impact Addendum

The Landscape and Visual Impact Addendum presents the results of the Applicant's revised assessment of impacts on landscape views in light of the minor changes to the design and layout of the onshore substations and National Grid substation since submission of the Applications, as well as to the Outline Landscape and Ecological Management Strategy (OLEMS). The changes consist of a reduced footprint, revised micro siting of western substation, retention of woodland to the west of the substation sites, reduced ground level of eastern substation (2m) and NG substation (0.7m), limited reduction in heights of equipment of the western and eastern substations. SPS also notes the Applicant's commitment to irrigation and management of the planting belts to nursery standard to ensure that their suggested growth rate is achieved.

The OLEMS shows an area of woodland which is to be retained due to the repositioning of the western substation, which is welcomed. In addition, we note that planting belts to mitigate impacts on landscape views are indicated in the vicinity of Little Moor Farm and Woodside Farm. Assuming that the tree belts are planted on the standard 3m centres, the visualisations show only three rows of trees. Therefore, it is reasonable to assume that the planting strip is no more than 10m in depth. SPS considers this to be wholly inadequate to effectively mitigate the visual impacts and would expect to see a minimum of 30m. Furthermore, there is no information regarding species, size of the plants and percentage of evergreen. In the absence of this level of detail it is not possible to make a robust assessment on the likely effectiveness of the proposed mitigation, but we remain of the view that the scale of the planting is insufficient and consider the visualisations to be highly optimistic.

Furthermore, we continue to remain concerned about the anticipated growth rate of the planting. This part of Suffolk is historically very dry and growth rate is typically not expected to exceed more than 300mm per year. The visualisations suggest a height in the region of 8/9m. This significantly exceeds the likely rate of growth. One only has to look at the site to see that there are no truly big trees in this landscape, this testifies to the difficult growing conditions.

Furthermore, we note the proposed irrigation to support these optimistic growth rates. Not only will this artificial level of support not guarantee robust growth in the medium to longer term, it is also considered to be a deeply unsustainable approach. Suffolk has declared a climate emergency and bringing water to site to irrigate trees is considered to be an entirely unsustainable approach to horticulture.

Revisions to the assessment of landscape impacts

In particular we note that the Applicant has revised the magnitude of change (operation, 15 years post construction) from medium-high to medium from landscape viewpoint 2 which is at the beginning of the PRow from St Mary's Church towards the substation site. SPS disagrees with this assessment as the current open views across Friston Common will be lost and the design changes and additional proposed planting does not mitigate this.

Amended landscape impact viewpoints

The SPS wishes to comment specifically on those visualisations in regard to the concerns previously raised in our submission and whether we agree that they mitigate the identified visual landscape harm:

Landscape Viewpoint 1 - The re-siting of the west substation in a north easterly direction, moves it further away from this viewpoint, and together with additional planting will reduce the impact to a degree. However, we note that the OLEMS describes the areas of planting that would effectively screen the development as "W1 Potential Early Core Woodland Planting and "W2 Potential Early Screen Woodland". We do not understand why this mitigation is qualified by the use of the word *potential*. Moreover, we remain unconvinced by the scale of the tree belt and the achievable growth rate and therefore the SPS retains its objection as set out in our previous representation.

Landscape Viewpoint 2 - The current open views across Friston Common from Church Road will be lost and the design amendments and additional proposed planting provide no mitigation for this. Moreover, we note that the OLEMS describes the areas of planting that would effectively screen the development as "W1 Potential Early Core Woodland Planting and W2 Potential Early Screen Woodland". We do not understand why this mitigation is qualified by the use of the word *potential*. Moreover, we remain unconvinced by the scale of the tree belt and the achievable growth rate and therefore the SPS retains its objection as set out in our previous representation.

Landscape Viewpoint 5 - The visualisation effectively demonstrates that the views over the wider landscape and in particular towards St Mary's Church, will be lost. The landscaping proposed merely exacerbates the loss of this visual, historical and cultural link. Despite the reduction in height of some of the structures the gantries of the National Grid and Western substation remain highly prominent in the landscape.

Heritage Addendum

The Heritage Addendum submitted on 15 January 2021 presents the Applicant's revised assessment of impacts on the significance of heritage assets in the vicinity of the onshore

substations, in light of the minor changes to the design of the onshore substations and National Grid substation since submission of the Applications, as well as to the Outline Landscape and Ecological Management Strategy (OLEMS). The changes consist of a reduced footprint, revised micro siting of western substation, retention of woodland to the west of the substation sites, reduced ground level of eastern substation (2m) and NG substation (0.7m), limited reduction in heights of equipment of the western and eastern substations, and additional potential planting.

Revisions to the assessment of cultural impacts

The Applicant's revisions to the assessment of impacts on cultural heritage amount to a reduction of the magnitude of impact on Woodside Farm from medium to low adverse and significance of effect from moderate to minor. The magnitude of impact on Little Moor Farm is also judged to have decreased from medium to low adverse and the significance of this effect from moderate to minor. All other impacts are judged to be unchanged by the revisions.

The SPS agrees that the changes will not alter the level of impact on St Mary's Church, Friston war memorial, Friston House and High House Farm. However, we continue to strongly disagree with the applicant's assessment of the levels of harm identified.

The SPS disagrees with the suggested reduction in impact on Little Moor Farm. Whilst the various changes to the substation design are welcomed, the potential 2m reduction to the ground level of the eastern substation will have only a marginal effect upon the visibility of the structure in views southwards from Little Moor Farm – see comments on viewpoints CHVP3 and CHVP4 below. The SPS is also unconvinced that the impact on Woodside Farmhouse has been adequately assessed – see our comment on viewpoint CHVP5.

Amended cultural heritage viewpoints

The Applicant submitted revised cultural heritage viewpoints to reflect the proposed design changes. The SPS wishes to comment specifically on those visualisations in regard to the concerns previously raised in our submission and whether we agree that they mitigate the identified heritage harm:

CHVP3 Moor Farm and Little Moor - The visualisation effectively demonstrates the SPS objection that the view from Moor Farm and Little Moor Farm will be lost, together with its relationship to the wider landscape and in particular St Mary's Church. The landscaping proposed merely exacerbates the loss of this visual, historical and cultural link. Despite the reduction in height of some of the structures the gantries of the National Grid and Western substation remain highly prominent in the landscape.

CHVP4 PRoW E of Little Moor Farm - The visualisation effectively demonstrates that the relationship between Moor Farm and Little Moor Farm and the wider landscape and in particular St Mary's Church, will be lost. The landscaping proposed merely exacerbates the loss of this visual, historical and cultural link. Despite the reduction in height of some of the structures the gantries of the National Grid and Western substation remain highly prominent in the landscape.

CHVP5 PRow near to Woodside Farmhouse - We continues to argue that this viewpoint is not helpful in assessing the impact on Woodside Farmhouse as the asset blocks the view of the substation site. We do not agree that the visualisation needs to be from the PRow. The impact from the rear of the designated heritage assets should be shown. The re-siting of the west substation in a north easterly direction moves it further away from Woodside Farm which, together with the planting, does reduce the impact to a degree. However, we note that the OLEMS describes the areas of planting that would effectively screen the development as "W1 Potential Early Core Woodland Planting and W2 Potential Early Screen Woodland". We do not understand why this mitigation is qualified by the use of the word *potential*. There is also a lack of information regarding the scale of the tree belt and the achievable growth rate and there is no information regarding species, size of the plants and percentage of evergreen.

CHVP7 Views from Friston House – The re-siting of the west substation in a north easterly direction moves it further away from Friston House which, together with the proposed planting, does reduce the impact to a degree. However, we note that the OLEMS describes the areas of planting that would effectively screen the development as "W1 Potential Early Core Woodland Planting and W2 Potential Early Screen Woodland". We do not understand why this mitigation is qualified by the use of the word *potential*. There is also a lack of information regarding the scale of the tree belt and the achievable growth rate and there is no information regarding species, size of the plants and percentage of evergreen.

CHVP8 – Friston War Memorial – SPS continues to argue that the selection of the viewpoint failed to properly illustrate the damage to a wide range of views from across the churchyard and not just one highly selective view behind a copse of trees. The amended visualisation does not address this fundamental issue.

CONCLUSION

While the SPS acknowledges that SPR has sought to mitigate the identified heritage and landscape harm by changes to the size of the footprint and siting of the east and west substations, together with a reduction in height of some of the ground levels and structures and the retention of woodland to the west and increased planting, the impact of the scale and character of the structures on the receiving landscape remains extremely damaging and incapable of meaningful mitigation.

We remain unconvinced by the scale of the tree belt and the achievable growth rate, and there is no information regarding species, size of the plants and percentage of evergreen. Therefore, the SPS retains its objection as set out in our previous representation and continues to object to the choice of Friston for the onshore infrastructure associated with EA1(N) and EA2.

Yours sincerely,



Fiona Cairns IHBC MRTPI
Director