



Scottish Power Renewables
East Anglia 1 North and East Anglia 2 Offshore
windfarm proposals
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Dear Sir/Madam,

RESPONSE OF SUFFOLK COASTAL AND WAVENEY DISTRICT COUNCILS AND SUFFOLK COUNTY COUNCIL TO THE STAGE 2 CONSULTATION BY SCOTTISH POWER RENEWABLES ON THE EAST ANGLIA 1 NORTH AND EAST ANGLIA 2 OFFSHORE WIND FARMS (PID ROUND 3).

The local authorities welcome the opportunity to comment formally and publicly on the proposals for the third and fourth phases of offshore wind farm developments forming the East Anglia Array.

We have participated fully in the previous process for the East Anglia 1 offshore windfarm (currently under construction) and the East Anglia 3 offshore wind farm (consented) and we look forward to continuing to co-operate in discussions for East Anglia 1 North and East Anglia 2.

It is understood that the consultations are taking place concurrently but the two projects will separate and be considered independently of each other in due course. These comments equally apply to both projects as currently presented for consideration in the Public Information Days (PIDs) in June/July 2018.

The timing of the PIDs is accepted given the requirement to access the maximum local population. However, the absence of printed information to take away and digest is a disappointment given this is intended to be a formal round of public consultation.

In addition, branding the event as information days has taken away some of the formality of the process and is not necessarily clear that this is a stage 2 consultation requiring input from the local population.

The local authorities have been considering these proposals for some time in pre-application discussions and have made representations to SPR in relation to the project. However, not all of these previously raised considerations have made it to the PIDs so it is considered appropriate for the local authorities to publicly raise their concerns and considerations in relation to the proposal to connect both of the offshore windfarm projects at Sizewell to connect to the National Grid Power lines.

Alongside considering SPR's proposal, the local authorities have been made aware via National Grid's TEC register of the offer for two inter-continental connectors – Eurolink and Nautilus - to be connected to the National Grid at Sizewell. Having reviewed other such developments across the country, the local authorities are aware of the associated infrastructure required to facilitate two such proposals including a substation connection to the grid lines and converter stations for each cable. These connectors will cross the North Sea and connect into Belgium and the Netherlands. From connection dates given it can be estimated that there will be a crossover in onshore construction of the inter-continental connectors with the offshore wind farm proposals. In addition, all four of these projects will crossover from a construction phase perspective with construction of the new nuclear power station at Sizewell C, given the recently estimated dates for that project. This is a significant concern for the local authorities and the proposals are all of such a scale and magnitude that they cannot be considered in isolation as independent proposals. The implications for the local population and East Suffolk as a whole are significant too. SPR do not address or refer to the inter-connector proposals in their consultation.

Site Selection process

The exhibitions demonstrate a site selection area for the onshore elements of the project that has been further assessed since the previous round of public consultation and the site (formerly known as site 7) to the west of Leiston and immediately north of the village of Friston has been identified for the location of the onshore infrastructure. This chosen site is outside of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).

The local authorities previously highlighted a number of principles that we considered should be adhered to in the site selection process and mitigation for the onshore elements of the project. These are listed below with commentary as to whether or not we consider SPR has appropriately considered these principles in their site selection process:

- 1) Site selection should seek a location / locations which minimises visual harm to the landscape, recreational, and residential receptors. This may be achieved through:
 - a) A close visual relationship to the existing built environment; this is not considered successful in the choice of site 7 in open arable farmland to the north of Friston village.
 - b) The screening by existing blocks of woodland or belts of trees; the chosen site is to the west of Grove Wood and ancient woodland which may provide some screening to the project. However to the south, north and west of the chosen site there is limited natural screening potential.
 - c) A location that offers the ability to minimise the need for the additional building height required by noise attenuation structures; There are residential properties close to the chosen site which may necessitate noise attenuation structures. There has not been adequate information provided to date to assess this.
 - d) The minimisation of bulk and height of the structure(s); this has not changed since the previous round of public consultation.

- e) The minimum footprint required; (this has not changed since the previous round of public consultation) and
 - f) Careful design of the structure(s). Detail design of the structures has not yet been provided so this cannot be further assessed. In addition this would include the flood alleviation measures proposed and the transport access to the site during the construction phase (including the cable corridor) and the operational phase.
- 2) Sites both inside and outside the AONB should be properly considered. The context for this is that set out in the National Policy Statement for Energy (EN-1), Section 5.9. This confirms that AONBs have the highest status of protection in relation to landscape and scenic beauty. However, it goes on to say that development consent may be granted in such areas in exceptional circumstances. These include the cost of, and scope for, developing elsewhere. In the view of the local authorities, the impacts of both sites within and outside the AONB need to be considered, taking into account the relative impacts (costs) albeit noting the weight to be given to the AONB.
- 3) The local authorities would expect sites within both the east and west of the site selection zone to be considered in detail. It is considered that the selection process to date could have been more detailed, the justification put forward for the chosen site, 7, is weak and does not fully take into account the adverse impacts on the village of Friston, heritage assets in the vicinity and the landscape, nor has the cable route proposed fully addressed outstanding concerns with regards to adverse impact on protected landscapes and species and heritage assets along the route.
- 4) Where additional soft landscaping is required to mitigate the visual and amenity impacts of the project it is suggested the following are appropriate:
- a) Recessive colouring and simplicity of form and design;
 - b) Meaningful lowering of the floor level of the building given the opportunities offered by a free draining substrate; and
 - c) An unlit structure, unless staff are present on site, with the use of Low Light surveillance or IR lighting to provide security.

Principle 4 remains as previous, and there has been no additional information provided in this round of consultation to demonstrate that the above will be considered / included.

To these principles should be added that site selection should seek a location and a cable route to that location that minimises potential harm and disturbance to biodiversity. Any unavoidable harm should be appropriately mitigated and fully compensated together with an indication of how this will be achieved. To enable this to be properly considered, the fullest possible survey information must be submitted to the local authorities - as and when it is available - for consideration and discussion. The local authorities are aware that an extensive habitat survey has been prepared but they have not seen any outcomes to date.

All of these assessments should take into account the in-combination effects with the other major energy projects proposed in the area, including Sizewell C; National Grid Ventures' inter-connectors and NGET's own sub-station.

Notwithstanding the above principles, the local authorities still have significant concerns with the limiting of the site selection area as illustrated and considered by SPR, including the non-inclusion of EDF Energy owned / controlled land to the north of the identified onshore study area. It is considered that this piece of land adjacent to the Greater Gabbard and Galloper offshore wind farm substations, appears to offer an opportunity to site onshore infrastructure in close proximity to similar infrastructure in a location already screened by landscaping with potential for additional screening. The local authorities remain of this opinion and are disappointed that SPR have not taken the opportunity to include it in this further round of public consultation.

In pre-application discussions, in the previous round of public consultation and in other discussions with SPR, local authority officers have requested that SPR should extend the area of search for a connection site beyond the area defined to date and we still consider this to be appropriate. The request was made to ensure that all reasonable options to accommodate the projects were considered, having particular regard for the need to minimise harm and identify a site which could accommodate both SPR and the inter-continental connector projects alongside each other in order to minimise the overall impact of the proposals.

In the absence of satisfactory evidence in relation to the suitability or unsuitability of the site north of the Sizewell Gap Road, the local authorities consider that in this respect the site selection process to date is inadequate and flawed.

The proximity of parts of the eastern side of the search area to existing development – major energy infrastructure, is considered a potential positive, therefore extending the site selection zone to include the fields to the north of the Sizewell Gap Road in close proximity to the Greater Gabbard and Galloper substations and with the back drop of Sizewell A and Sizewell B could be a more appropriate setting for the large structures required for the onshore substations to service SPR's projects and the converter stations required for the inter-continental connector projects. Therefore, the local authorities consider that land both north of Sizewell Gap Road as well as that to the south should be evaluated as a potential location.

Onshore visualisations

The presentations seen to date illustrate the significant concerns that the local authorities have regarding this open countryside site. Whilst it may be possible to partially mitigate some of the visual impacts with planting this will not be timely mitigation (perhaps with a 30 years period to become effective). Notwithstanding any successful partial mitigation of visual impacts, there is likely to be permanent adverse landscape and visual effects as a result the magnitude of change caused by the proposal

The comments relate only to the SPR proposals. The proximity of future National Grid Ventures infrastructure would be likely to create significant in-combination effects and accentuate the negative effects of the proposed site. It should be noted that these effects are likely to arise with both co-location or if the sites are more distant from each other it is likely to give rise to significant sequential effects.

Comparison of Friston and Sizewell Gap sites

At the previous stage of public consultation in March, the local authorities set out their interim view on the seven sites identified by SPR in their restricted onshore site selection area.

The local authorities have always considered that given the national status of the AONB's designation that it was important that the impact of development on alternative sites outside the AONB should also be tested. Based on the information and discussions to date and being mindful of the need for both SPR and the inter-continental connector projects to connect to the Grid, possibly and hopefully via the same connection substation, our views in relation to the western sites were:

Although the western sites are outside of the AONB, they are open countryside which is to be protected from development as detailed in Local Plan policy and the National Planning Policy Framework. The question then needs to be tackled of whether the overall harm to the environment of developing the sites to the west exceeds that of the eastern sites, including their AONB status. In addition, siting to the west of the search area will involve the construction and creation of a longer cable corridor, (the detail of which we do not yet have), and the loss of woodland to the south of a Grade II listed building. Having reviewed the proposals to take out the woodland to the south of Aldringham Court, Grade II listed building, we do have serious concerns on the adverse impact of this on the setting of the listed building. Full details were included in our previous response and as yet we have not been advised of any heritage assessment completed by SPR in relation to this important building.

To date, the local authorities have not been provided with any detailed ecological, landscape, archaeological, heritage asset or other constraints assessment of accessing the western sites in the site selection area and this has limited our ability to comment in full on the suitability of any site to date. However, if the destruction of the woodland south of

Aldringham Court, is the only acceptable location to access the west, then as local authorities, we remain concerned and of the opinion that we would have great difficulty in supporting a route through to the western sites at this location.

The opportunities for screening potential are more limited in the western area given the existing landforms, no information has been provided by SPR to date that would alleviate this concern.

There is a balance to be struck between the impact of extensive new development in the open countryside in a rural area and the creation of new development within the AONB. At this stage, as per the previous round of public consultation, there is not enough information provided to give a fully justified opinion on whether east or west would be more appropriate but currently, on the basis of information to date, the impact on the open countryside to the west is potentially more detrimental than the impact on development within the east given potential mitigation and screening methods that could be available. This concern remains the opinion of the local authorities.

Furthermore, it is apparent that construction of a cable route to the west that has the capacity to accommodate all projects (including those of National Grid Ventures) carries with it significant additional technical challenges. Given the sequencing of the projects the local authorities have not been given any confidence that all projects could be accommodated and consider there is a risk that a second grid connection would be required, or more likely that it would not be possible to parallel the cable corridors for the two SPR and the two inter-continental connector projects along their entire length, especially at the Aldeburgh Road pinch point.

It remains the position of the local authorities that eastern sites adjacent to the Sizewell Gap Road should, despite their location within the AONB, be incorporated in SPR's site selection zone and properly assessed and considered.

The locations adjacent to the Sizewell Gap Road still require further investigative work and, while no conclusions have been reached, it appears that they could:

- Minimise the impacts of construction and operation of the site and the cable corridor on local communities and public/ residential amenity - although there would be additional challenges in sharing a construction route with EDF Energy construction traffic for Sizewell C and this would need to be mitigated and potentially compensated for;
- Minimise the permanent loss of habitat and the severance of ecological corridors. However, further work on this, including any habitat mitigation or compensation that may be required, will be needed;
- Minimise harm to both archaeological features and the setting of heritage assets. Additional work on cable runs and their exact siting will be required to explore this further;

- Minimise the technical risks to the delivery of a shared connection and joint siting of all projects, subject to further information and detailing relating to all of the proposals;
- Minimise the magnitude of landscape change at the connection site given the presence of an existing energy cluster of a comparable scale. This is a key advantage which sites on the western side of the site search area do not have in comparison;
- Offer opportunities for dense planting of conifers which provide comparatively rapid and effective screening and the opportunity to modify the landform to dig in the structures. This would be appropriate for both the character of area and the sandy soil type in a way that is not the case at Friston;
- Possibly offer opportunities to utilise soil which will need to be stripped from EDF Energy land as part of the Sizewell C development for bunding purposes;
- Utilise the higher background noise environment which already exists close to Sizewell B, Greater Gabbard and Galloper substations;
- Utilise the better road network close to Sizewell to reach any haul roads and the new substations during the operational phase.

The local authorities' current position is that we cannot support the western site put forward on the basis of information received to date. It would have a significant visual, landscape, and economic impacts alongside significant heritage impacts, archaeological impacts and ecological impacts not yet fully considered by the project.

Offshore elements of the proposal

Information presented to date to the public does not adequately illustrate the likely extent and magnitude of the impacts of the offshore turbines. However the local authorities consider that, based on the information presented to date, there is likely to be widespread and significant impacts on the undeveloped character of the Suffolk coast. This is a key component of the setting and character of the AONB.

In order for both the public and local authorities to properly understand these issues the next round of consultation in January 2019 should include computer visualisation of the proposals to properly illustrate the impacts of the scheme at different times of year/ day and in different conditions including at night. This would be beneficial to the public, consultees and the Planning Inspectorate.

It is suggested the applicant should produce a product akin to that prepared for the Inch Cape Offshore Limited project; as set out at <https://www.bluesky-world.com/single-post/2017/11/13/Bluesky-3D-Models-Used-to-Create-VR-Simulation-of-Offshore-Wind-Farm>

This approach, which has been effective elsewhere, (including in Suffolk in relation for the Bramford to Twinstead connection project), would enable the public, the consultees and the Planning Inspectorate to understand much more clearly and with much greater confidence the likely effects of this element of the project.

This modelling would also facilitate the assessment of how the visual change to the offshore environment and the nature of the Suffolk coast would impact on resident and visitor perceptions on the quality and character of place, as well as any consequent impacts on the visitor and tourist economy.

The Local Authorities consider that on the basis of this modelling and assessment of effects, the discussion of mitigation and compensation for any residual impacts could take place on a sound footing that would command public confidence. Given the nature scale and likely impacts of the project this is considered essential.

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Next steps required:

The local authorities consider that further work is required to inform site selection within the current or the extended search area which to date has not been provided. This would include:

- 1) A detailed examination of the impacts of the Councils suggested east and SPR's preferred west options *and* their associated cable corridors in terms of both construction and operation. This should cover a range of issues, (such as transport, ecology, noise, landscape historic environment etc.) to be agreed in advance with the local authorities and other statutory consultees. It is important that the cable corridor can accommodate both SPR and National Grid projects. If this cannot be achieved or will present significant loss of amenity then those site options should be dismissed. This information has not been provided to date and is restricting the local authorities' ability to make informed decisions on the proposals to date.
- 2) Evaluation of the findings, and selection of the initial preferred option on that basis. A site has been chosen without the additional information requested above being provided; the local authorities therefore find it difficult to understand the justification for the site selection to this point in time.
- 3) Evaluation of this initial preferred option against the policies within the relevant National Policy Statements. This information has not been provided.
- 4) Identification of the preferred site in consultation with the statutory consultees. It is not clear what the statutory consultees consider in relation to the identified preferred

site. The local authorities do not support the chosen site for the onshore developments.

In addition, further attention needs to be given to the presentation of visualisations of the offshore infrastructure in readiness for the next round of consultation and the impact that this may have on the setting of the coast and setting of the AONB character with any consequences on the tourism industry.

We recognise that there is a wide range of issues raised in this letter and the local authorities wish to work with the applicant to seek to resolve these as far as possible.

Yours faithfully,



Philip Ridley

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Management

Suffolk Coastal District Council and
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