

## **Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership Written Representations for EA1N and EA2**

This representation is made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership. The Partnership is made up of around 25 organisations who are committed to the purposes of the AONB designation, to conserve and enhance natural beauty. **For the avoidance of any doubt, some individual members of the Partnership are public bodies or statutory undertakers who have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.**

It is worth noting that the AONB Partnership recognises the importance of the role of offshore windfarms have in producing sustainable electricity, but this should not detract from the characteristics of nationally designated landscapes.

The primary purpose of the statutory AONB designation is to conserve and enhance natural beauty. Statutory undertakers are required to pay regard to the purposes of the AONB. The Suffolk Coast and Heaths AONB defined natural beauty characteristics are available on its website at [https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/05/V1.8\\_Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf](https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/05/V1.8_Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf)

**The AONB Partnership's comments relate to both EA1N and EA2 unless specified.**

The AONB Partnership's main concerns are summarised below:

### **1) The Landscape and Visual Impact of the scheme on the nationally designated AONB, including its setting.**

The applicant acknowledges that there will be significant negative impacts on the defined characteristics of the AONB during the construction of the cable route. The AONB partnership diverge from the opinion of the applicant that this should be characterised as localised as the AONB Partnership consider the AONB to be a single entity and that damage to one part of the nationally designated landscape compromises the AONB as a whole. It is not appropriate to use 'localised' as a descriptor under these circumstances.

The AONB Partnership is further concerned that the applicants assertion that the onshore cable route construction is short term and temporary does not fully reflect the anticipated time scales of multiple cable routes as necessary for the delivery of two projects that may run concurrently and impacts will be felt by the AONB for a period of years potentially and this must be considered as the worst-case scenario and mitigation, or if not possible, compensation be adequate in recognition of these significant impacts.

The AONB Partnership acknowledges that once operational the effects of the landfall and onshore cable route would be not significant due to their presence underground.

### **2) The impact of the scheme on the defined natural beauty elements of the AONB, including landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage.**

For EA2 the AONB Partnership note that the applicant acknowledges that two of the six defined characteristics of natural beauty of the AONB, landscape quality and scenic quality will suffer significant long-term effect. The AONB Partnership acknowledge that these impacts are reversible but suggest that with the anticipated lifespan of the windfarm being 25 years, these impacts are long term, particularly with the likelihood of a re-charge for an additional 25 years.

In relation to the proposed embedded mitigation scheme for EA2, the AONB Partnership would draw on its expert advice from Alison Farmer Associates <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/EA2-SLVIA-Mitigated-Layout-Review-Final-Report-20200416.pdf> which concludes:

*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.*

Therefore, the AONB Partnership accepts that there is no mitigation for this impact and seeks maximum compensation in relation to the residual impact arising from the offshore elements of EA2.

### **3) The impact of the scheme on the defined special qualities of the nationally designated AONB, including health and wellbeing, community, economy and ecosystems goods and services.**

The AONB Partnership recognise the special qualities of the AONB as defined in the Natural Beauty and Special Qualities document, see [https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/05/V1.8\\_Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf](https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/05/V1.8_Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf)

It notes what the applicant has to say on this subject in 6.3.28.4 Appendix 28.4 of the Landscape Assessment : *The 'Special Qualities' of the AONB identified in Section 3.0 of this document are considered somewhat intangible for the purpose of assessment of seascape, landscape and visual effects, often considering factors which are related to, but are not specifically 'landscape' quality criteria, such as health and well-being, family heritage, food culture and tourism.*

THE AONB Partnership consider that the defined special qualities of the AONB such as health and well-being, community, economy, ecosystem goods and services are likely to be impacted by the development, particularly during the construction phase such as:

- Access to certain parts of the AONB will be affected impacting health and well-being.
- Construction activity will impact communities in a number of ways – noise, disturbance, disruption etc.
- Tourism, a key economic driver in the AONB, will be adversely impacted; and
- Construction has the potential to impact the public good gained from ecosystem services that might include products such as food and clean water, regulation of floods, soil erosion and disease outbreaks, and non-material benefits such as recreational and spiritual benefits in natural area.

The AONB Partnership therefore expects appropriate mitigation and where not possible, compensation in relation to the adverse impacts on the special qualities of the AONB.

#### **4) The impact of the scheme on the purposes of the nationally designated AONB, including its setting, to conserve and enhance natural beauty.**

The AONB has a statutory purpose to conserve and enhance natural beauty. The AONB appointed consultant, Alison Farmer Associates, concludes in the report *SLVIA [Seascape landscape and Visual Impact Assessment] Review EA2 and EA1N Final Report* that can be downloaded from <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/SLVIA-Review-EA2-and-EA1N-Final-Report-.pdf> 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 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.*

Compensation for the adverse impact the wind turbines will have on the special qualities of the AONB must be appropriate to the level of identified impact.

#### **5) How the scheme and the applicant has addressed its duty of regard to the purposes of the AONB.**

The AONB Partnership recognise and welcome the applicant seeking to locate the proposed associated substation outside the nationally designated landscape, although recognise the concerns of those who are likely to be impacted by the proposals. However, the offshore elements of the development will impact on the purposes of the AONB.

In relation to the proposed embedded mitigation scheme for EA2, the AONB Partnership would draw on its expert advice from Alison Farmer Associates <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/EA2-SLVIA-Mitigated-Layout-Review-Final-Report-20200416.pdf> which concludes:

*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.*

Therefore, as stated previously, the AONB Partnership accepts that there is no mitigation for this impact and seeks maximum compensation in relation to the residual impact arising from the offshore elements of EA2.

#### **6) The impact of the scheme on the ability of residents and visitors to enjoy the purposes of the AONB, its natural beauty and special qualities, for example public access and enjoyment of countryside.**

The AONB Partnership considers that the enjoyment of the nationally designated landscape by residents and visitors is critical. It defers to the statutory Highway Authority (Suffolk County Council) to ensure access via the public rights of way network is maintained to the

highest possible standard. However, it considers that public enjoyment of the AONB will be compromised by the offshore elements.

The Alison Farmer Associates report commissioned by the AONB Partnership, *SLVIA [Seascape landscape and Visual Impact Assessment] Review EA2 and EA1N Final Report* that can be downloaded from <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/SLVIA-Review-EA2-and-EA1N-Final-Report-.pdf> 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 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.*

Therefore, as stated before, the AONB Partnership accepts that there is no mitigation for this impact and seeks maximum compensation in relation to the residual impact arising from the offshore elements of EA2.

### **7) The impact of the scheme on the local economy, in particular the tourism industry, that relies on the natural beauty and special qualities of the AONB.**

The AONB Partnership does not accept the applicant conclusion that: *The construction impact is assessed as having major beneficial significance for local businesses and people working for them as summarised in Table 30.66. The long term impact on tourism is assessed as having negligible significance for the tourism industry within the Suffolk Coast AONB [sic].*

This does not recognise that tourism is a significant driver of the economy in the AONB, worth £228M and supporting over 5,000 jobs. 2020 study using 2019 figures see <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/10/Suffolk-Coast-Heath-AONB-Report-2019.pdf> The potential impacts of various energy projects impacting on the Suffolk Coast as outlined in the Suffolk Coast Limited Destination Management Organisation and AONB funded study at <https://www.thesuffolkcoast.co.uk/shares/The-Energy-Coast-BVA-BDRC-Final-Report-2019.pdf> which reports that 29% of people interviewed would be a lot or less likely to visit the area and could cost the tourism industry £24M.

Appropriate mitigation in the form of a Tourism Fund is required to enable identified bodies such as the Suffolk Coast Limited, Destination Management Organisation to mitigate the adverse impacts on tourism arising from this project.

### **8) The quality of and appropriateness of measures to avoid, mitigate and compensate for impacts on the natural beauty and special qualities of the AONB.**

The AONB Partnership considers that if the developments go ahead then compensation payments would be required in addition to the embedded mitigation of the proposed scheme (layout of offshore infrastructure and undergrounding of cables through the AONB).

Any compensation and mitigation funds should seek to meet the aspirations of the statutory AONB Management Plan. Such funds should reflect the impacts caused by the development during the construction, operation and decommissioning on the AONB. The AONB Partnership considers that compensation and mitigation funds should include representatives of the AONB Partnership in any decision making processes of how those funds are distributed.

**The AONB Partnership considers that the development proposals would cause significant harm to the nationally designated landscape.**