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By email only:

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**Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB)
Partnership response National Grid Ventures Consultation on Nautilus
Interconnector.**

The Suffolk Coast & Heaths AONB Partnership thank National Grid Ventures for the opportunity to comment on the National Grid Ventures proposals for the Nautilus Interconnector.

The Suffolk Coast & Heaths AONB Partnership

This consultation response 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 which 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 which 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.

Suffolk County Council, Essex County Council, Babergh District Council, Suffolk Coastal District Council, Tendring District Council, Waveney District Council, Ipswich Borough Council, Country Land and Business Association, The Crown Estate, Defra, Historic England, Environment Agency, Forestry Commission, Haven Gateway Partnership, National Farmers' Union, National Trust, Natural England, RSPB, Suffolk Association of Local Councils, Community Action Suffolk, Suffolk Coastal Business Forum, Suffolk Coast Ltd, Suffolk Farming & Wildlife Advisory Group, Suffolk Preservation Society, Suffolk Coast Acting for Resilience, Suffolk Wildlife Trust.

The AONB Partnership acknowledges the important part that renewable energy can provide in the nation's energy mix. It broadly supports the projects vision for the

scheme as outlined in the proposals and consultation document dated September 2021 that states:

As a MPI [Multi Purpose Interconnector] Nautilus will help to:

- *Support the UK to achieve its 40 GW of offshore wind by 2030 and net zero by 2050 climate targets.*
- *Reduce impacts on coastal communities and the environment by avoiding the need for every project to have its own separate connection infrastructure.*
- *Support the transition towards a cleaner energy system by providing 2.8 GW of flexible capacity between the GB and Belgian networks.*
- *Increase security of supply by ensuring energy flows from where it is being generated to where it is needed most.*
- *Promote more affordable energy bills in the UK by providing access to the lowest priced energy available between GB and Belgium.*

However, the AONB Partnership considers that National Grid Ventures should be explicit in its aspiration to meet the statutory purpose of the nationally designated AONB. That purpose requires public bodies and statutory undertakers to conserve and enhance natural beauty. See section 85 of Countryside and Rights of Way Act 2000ⁱ.

The AONB Partnership recognise 4 key components of the proposals and a further key consideration of cumulative impact when the proposals are taken into consideration with other major infrastructure projects impacting the AONB:

- 1. Onshore proposals**
- 2. Offshore proposals**
- 3. Cumulative impacts**
- 4. Other considerations**

The AONB Partnership would wish to make the following comments on elements of these proposals:

1. Onshore proposals

1.1 Onshore convertor station

While the AONB Partnership welcome the fact that National Grid Ventures have conformed to national policy to avoid major infrastructure (energy related or otherwise) within the nationally designated AONB it recognises the significant impact the proposals could have on communities and the environment outside of the nationally designated landscape. Therefore, it considers that the proposers of the scheme take all possible measures to avoid, minimise and mitigate any negative impacts and compensate for any residual impacts.

1.2 Onshore landfall

The AONB Partnership note that all five landfall options are within the AONB. It recognises that the proposals state that there will be 'very little' visible infrastructure once the project is in operational phase. The AONB Partnership considers that:

- Any infrastructure associated with the operational phase should seek to minimise the impact on the AONB and its defined natural beauty and special qualities, see Natural Beauty and Special Qualities indicator documentⁱⁱ and its Use and Selection of Use of Colour in Developmentⁱⁱⁱ.
- The AONB Partnership notes that a working area of 2 hectares of AONB is required during construction. It considers that the proposers of the scheme take all possible measures to avoid, minimise and mitigate any negative impacts and compensate for any residual impacts during the construction phase.
- The AONB Partnership notes that landfall option E is located in or near an ecologically sensitive area (natural heritage features are a defining quality of the AONB)

1.3 HVDC cable corridor from landfall to convertor station

The AONB Partnership recognise that the proposed convertor stations are outside the AONB but as landfall is within the AONB cable routes will necessarily cross the nationally designated landscape.

From its knowledge of other energy projects it anticipates that the construction of the these cable routes will have a significant impact on the defined qualities of the AONB and the ability of parts of the AONB to deliver its statutory purpose during construction. This may include, but not be limited to impacts on:

- Landscape quality
- Scenic quality
- Relative wildness
- Relative tranquillity
- Natural heritage features
- Cultural heritage
- And its special qualities

1.4 HVAC cable corridor from convertor station to NGET Substation

The AONB Partnership note that any significant impacts on the AONB are unlikely from this part of proposals. However, it considers that consideration of development in the setting of the AONB needs to acknowledge potential impacts on the nationally designated landscape.

Furthermore, it recognises the significant impact the proposals could have on communities and the environment outside of the nationally designated landscape. Therefore, it considers that the proposers of the scheme take all possible measures to avoid, minimise and mitigate any negative impacts and compensate for any residual impacts.

1.5 Cable routes (general)

Cable routes are likely to have significant impacts on cultural heritage, relative tranquillity (during construction), both of which are defined AONB qualities.

Furthermore, associated AONB special qualities and local communities are likely to be significantly negatively impacted.

2. Offshore proposals

2.1 Offshore converter station platform

The AONB Partnership note there is little information on the location of the proposed offshore converter station platform, but notes the considerable size of such a platform (110m long x 80m wide by 45m high) and the possibility of two such platforms. The AONB Partnership consider that:

- That the statutory purpose of the AONB should be considered in terms of impact on the nationally designated landscape from developing proposals.
- That the AONB should be consulted further on any further detail proposed relating to this element
- That the impact on the Suffolk Heritage Coast should also be considered
- See section 3 below on cumulative impacts.

2.2 Offshore submarine HVDC interconnector

The AONB Partnership is unlikely to provide any comment on the offshore submarine HVDC interconnector.

3. Cumulative impacts

3.1 Cumulative impacts with other major infrastructure projects impacting the AONB

The AONB Partnership have concern relating to the cumulative impact of major energy projects on the AONB and therefore its ability to deliver its statutory function. It recognises the vision of the scheme to 'reduce impacts on coastal communities and the environment by avoiding the need for every project to have its own separate connection infrastructure'. However, these proposals would by themselves see major development being introduced into the AONB and its setting. Therefore, it considers that the proposers of the scheme take all possible measures to avoid, minimise and mitigate any negative impacts of the project to minimise any cumulative impacts and to compensate for any residual impacts caused by the project.

4 Other considerations

4.1 Development in the setting of AONB

Any development associated within the setting of the AONB should consider the impact of the development on the nationally designated landscape. The National Planning Practice Guidance published by Government provides amplification on the National Planning Policy Framework and explains key issues in implementing the policy framework. The guidance on AONBs was updated in 2019. It recognises that where poorly located or designed, development within the settings of AONBs can do significant harm and therefore need sensitive handling that takes these potential impacts into account.

4.2 AONB Management Plan

The Suffolk Coast & Heaths AONB Management Plan should be a consideration when developing this type of proposal.

4.3 Consent for Friston Substation

That the Friston substation is not yet consented. If this does not secure consent than the proposals may require a significant revision and if this should be required the statutory purpose of the AONB should play a key role in any changes to the proposals.

4.4 Need for co-ordination between energy projects impacting AONB

The need for maximum effort to avoid negative impacts on the AONB and local communities needs to be demonstrated by the applicant through securing co-ordination between different projects, despite being proposed by different sponsors, is imperative.

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For and on behalf of the Suffolk Coast & Heaths AONB Partnership
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ⁱ <https://www.legislation.gov.uk/ukpga/2000/37/section/85>

ⁱⁱ <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath.pdf>

ⁱⁱⁱ <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/SCH-Use-of-Colour-Guidance-v7.pdf>