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By email only:

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**Suffolk Coast & Heaths AONB Partnership response to:
Five Estuaries Offshore Wind Farm Public Consultation July-August 2022**

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership thank Five Estuaries Offshore Wind Farm Ltd for the opportunity to comment on their proposals to build an Offshore Wind Farm and associated connection, including a new substation, to National Grid's network.

The AONB Partnership acknowledges the important part that renewable energy can provide in the nation's energy mix and the aspiration to move to net zero.

The AONB Partnership

The Partnership was formed in 1993, it comprises public, private and voluntary organisations who are committed to conserving and enhancing the Natural Beauty of the AONB. The Partnership's role is to act as an advocate for the AONB and oversee the delivery of the AONB Management Plan. The AONB Partnership consists of:

Babergh Mid Suffolk District Council, East Suffolk Council, Essex County Council, Ipswich Borough Council, Suffolk County Council, Tendring District Council, Community Action Suffolk, Country Land and Business Association, The Crown Estate, Defra, Environment Agency, Forestry Commission, Historic England, National Farmers' Union, Natural England, National Trust, Royal Society for the Protection of Birds, Suffolk Association of Local Councils, Suffolk Coast Acting for Resilience, Suffolk Coast Ltd, Suffolk Farming & Wildlife Advisory Group, Suffolk Preservation Society, Suffolk Wildlife Trust.

It should be noted that:

Many of these partners are public bodies or statutory undertakers which have the duties to conserve and enhance the Natural Beauty of the AONB as set out in section 85 of the Countryside and Rights of Way Act (2000). It is anticipated that these partners, and other members of the Partnership, will provide separate consultation responses that reflect these and other interests and responsibilities.

This response has been endorsed by the Dedham Vale AONB Partnership chairman and vice chairman in relation to comments relating to the potential impacts on that AONB. References in this response to 'AONB Partnership' purely relate to the Suffolk Coast & Heaths AONB Partnership.

**The AONB Partnership response to:
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The AONB Partnership has formed its view on these proposals from information provided by Five Estuaries Offshore Wind Farm Ltd from:

- The Five Estuaries website (viewed 20 July 2022)
- AONB staff attendance at a public event in Lawford (14 July 2022)
- Five Estuaries Newsletters (Autumn 2021 and Summer 2022)
- Various Pre Consultation Expert Topic Group meetings

Summary of AONB Partnership response Five Estuaries Offshore Wind Farm Public Consultation July-August 2022

- The AONB Partnership has concern about the impact that the offshore element will have on the nationally designated landscape, in particular the experience of those using the AONB for recreational purposes from the industrialisation of views from the AONB and increasing the 'curtain effect' of offshore industrial development. It considers the impacts of the offshore element and in combination impacts should be assessed for effects on the Suffolk Coast & Heaths AONB.
- The AONB Partnership acknowledge that the onshore proposals have sought to avoid introducing major onshore development, such as overhead cables and substations, into the nationally designated AONB. However, there is concern about potential impacts from the proposed substation in the setting of the Dedham Vale AONB and consider these should be assessed.
- The AONB Partnership considers that the mitigation hierarchy (avoid, minimise, restore and compensate) should be employed in relation to impacts on the AONB
- The AONB Partnership acknowledge the benefit that offshore wind generated electricity can bring to meeting the aspiration for net zero.

The AONB Partnership consider that the proposals need to be determined against the relevant National Policy Statements, Legislation and other relevant policy, plans and guidelines. The AONB Partnership notes that:

- A) The Overarching National Policy Statement for Energy (EN1), paragraph 5.9.9, states:

Development proposed within nationally designated landscapes

National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC [Now Planning Inspectorate] should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC [Now Planning Inspectorate] in deciding on applications for development consent in these areas.

The AONB Partnership considers that to conform to EN1 that the proposed developments should not significantly negatively impact nationally designated landscape.

- B) The National Policy Statement for Renewable Energy Infrastructure (EN-3), paragraph 2.5.33 states:

In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), consent for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.

The AONB Partnership considers that to conform to EN3 that the proposed developments should not have significantly negatively impact nationally designated landscape. Where there are significant adverse impacts these should be outweighed by environmental, social and economic benefits

- C) The draft National Policy Statement EN-5 on Electricity Networks Infrastructure States in para 2.11.11:

The Horlock Rules – guidelines for the design and siting of substations were established by National Grid in 2009 in pursuance of its duties under Schedule 9

of the Electricity Act 1989. These principles should be embodied in Applicants' proposals for the infrastructure associated with new overhead lines.

It then briefly references the Horlock rules including:

seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections

The AONB Partnership considers that to conform to the draft EN5 that the proposed development should pay regard to AONB purpose when linking to the proposed substation and that National Grid should consider the AONB in its proposals relating to the substation.

D) Section 85 of the Countryside and Rights of Way Act (2000) that states:

General duty of public bodies etc

(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.

(2) The following are relevant authorities for the purposes of this section—

(a) any Minister of the Crown,

(b) any public body,

*(c) **any statutory undertaker** [our emphasis]*

(d) any person holding public office.

The AONB Partnership considers that Five Estuaries Offshore Wind Farm Ltd as a statutory undertaker is required to pay due regard to the purpose of the AONB when undertaking its operations and decision making.

E) The statutory Suffolk Coast & Heaths AONB Management Plan 2018-23 outlines within its 25 year vision for the area that:

Nationally Significant Infrastructure Projects such as energy production and its associated infrastructure should seek to avoid damage to the natural beauty of the AONB and where this cannot be achieved it should seek to minimise, mitigate and compensate for any residual damage.

The AONB Partnership considers that the Five Estuaries Offshore Wind Farm Ltd proposals for development require the proposals to meet the aims of the statutory AONB Management Plan.

The AONB Partnership recognise three elements of the proposal from the consultation:

- i) Offshore Proposals**
- ii) Onshore Proposals**
- iii) Cable Routes Proposals**
- iv) Socio-economic impacts**

The three elements are considered below:

i) Offshore Proposals

The AONB Partnership recognises that the offshore element is at least 37km from shore. It considers that the height of the proposed turbines and the cumulative impact from this, existing and planned developments has the potential to have adverse impact on the AONB.

The AONB Partnership requests that an assessment of the offshore element of the proposals be undertaken against the defined natural beauty and special qualities of the Suffolk Coast & Heaths AONB. It considers that a further assessment of the proposed offshore development on the ability of the AONB to deliver statutory purpose should be undertaken. This should include any cumulative impacts of the proposals from existing offshore wind and other proposals in development.

The AONB Partnership consider that Five Estuaries Offshore Wind Farm Ltd should consider further view points in the AONB to fully consider the impact on the nationally designated landscape.

ii) Onshore Proposals

The AONB Partnership recognises that Five Estuaries Offshore Wind Farm Ltd intend to build a substation close to the proposed National Grid's proposed substation as part of their East Anglia Green proposals.

It welcomes that Five Estuaries Offshore Wind Farm Ltd have appeared to recognise the nationally designated landscapes in identifying potential sites outside any AONB for these major developments as policy dictates. The AONB Partnership considers that the any decisions made on which of the proposed substation areas is selected should recognise any potential impacts on the Dedham Vale AONB's Natural Beauty characteristics and ability to deliver statutory purpose. This includes any impacts on the AONBs from development in the setting of the nationally designated landscapes.

The AONB Partnership requests that an assessment of impacts on the Dedham Vale AONB should inform decision making relating to a preferred area to build the substation and work with National Grid to co locate infrastructure to minimise harm to the nationally designated AONB.

iii) **Cable Routes Proposals**

The AONB Partnership acknowledge the proposal to underground the necessary cables from landfall to the substation. It considers this will minimise any negative impacts on the nationally designated Suffolk Coast & Heaths and Dedham Vale AONBs.

The AONB Partnership consider that for the development of underground cable routes to minimise the negative impacts on the nationally designated landscape the developer should:

- Maintenance and inspection infrastructure should be kept to a minimum and located and designed to minimise any adverse impacts on the AONB, including any development that is in the setting of the AONB.
- Systems of work during construction should include measures to minimise the impacts on the AONB characteristics. This should include, but not be limited to, measures to reduce the adverse impacts of light, dust, noise on the visual amenity and tranquillity of the AONB.

iv) **Socio-economic impacts**

The AONB Partnership request that the proposer of the project considers the economic impacts of its project and on the tourism industry and residents' quality of life. The AONB has an important role to play in the tourism industry, that supports over 4,000 jobs and is worth over £250M pa. The natural beauty and special qualities of the AONB are a key driver for the tourism industry, in particular its landscape quality, tranquillity and natural heritage features.

Residents in the AONB enjoy significant quality of life indicators due to the natural beauty characteristics conserved and enhanced in the AONB.

The AONB Partnership consider that the introduction of industrial development off the coast of the AONB and further major developments potentially in the setting of the AONB will have an impact on the ability of the AONB to deliver statutory purpose and should be assessed.

Yours sincerely,



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cc

Cllr Nigel Chapman, Chairman of Dedham Vale AONB Partnership
Cllr James Finch, Vice Chairman of Dedham Vale AONB Partnership