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By email only:

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**Suffolk Coast & Heaths AONB Partnership response to:
National Grid Ventures EuroLink Non Statutory Consultation Oct to Dec 2022**

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership thank the National Grid Ventures as proposers of the EuroLink project for the opportunity to comment on their proposals. These proposals will include the need for the following infrastructure, some of which has the potential to have a negative impact on the nationally designated AONB such as:

- Undersea cables
- Converter station
- Landfall site
- Cable corridor (Landfall to converter station)
- Cable corridor (Converter station to proposed Friston substation)

The AONB Partnership notes that the proposals will be for infrastructure that have the declared vision to: *improve affordability of energy, enhance energy security and support zero carbon energy.*

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.

Suffolk Coast & Heaths AONB Partnership response to the National Grid Ventures proposals outlined in information provided for the EuroLink Non Statutory Consultation Oct to Dec 2022.

The AONB Partnership will restrict itself to commenting on proposals that impact its area of interest, ie those proposals that impact the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and the statutory purpose of AONBs.

The AONB Partnership has formed its view on these proposals from information provided by National Grid Ventures from:

- The Project website accessed from 25 Oct 2022
- Information shared by project proposer at working group meetings
- Site visits
- Discussion with AONB partners and others with knowledge of the proposals

Summary Suffolk Coast & Heaths AONB Partnership response to National Grid EuroLink Public Consultation Oct to Dec 2022. It considers that:

- All proposals should adhere to all relevant policy including that outlined in this response.
- Landfall should avoid the nationally designated AONB due to the adverse impact caused by the installation of underground cabling during construction. Parts of the AONB will not be able to deliver its statutory purpose during this phase.
- Proposals such as put forward are not geographically restricted and do not need to come ashore within the AONB.
- The schemes proposer has only identified landfall sites within the AONB. This is unacceptable. The justification of these landfall site proposals, leading to major development in the AONB which is contrary to national policy, should be shared and explained.
- The cable routes, whether by Horizontal Directional Drilling or open trench will lead to loss of parts of the AONB to deliver statutory purpose during construction.
- As the schemes proposer has identified sites for a convertor station outside the AONB Convertor Station site 1 should be dismissed to avoid unnecessary damage to the nationally designated landscape.
- The loss of part of the AONB to deliver its statutory purpose during construction is likely to have a negative impact on the tourism industry in the AONB..
- Negative impacts to the defined qualities of the AONB, including landscape quality and natural heritage features should be subject to the mitigation hierarchy.
- Impacts will be experienced users of the coast path and the defined Heritage Coast, and they should be assessed in a similar way to the impacts on AONBs.
- The proposed scheme needs to be considered in combination with other energy projects in the area and cumulative affects should be assessed and a collaborative approach should be taken to minimise negative impacts.

The AONB Partnership are aware of several other Nationally Significant Infrastructure Proposals impacting on the AONB. While recognising the that the proposer of this scheme is engaging with other project proposers the AONB Partnership considers the need for the cumulative impacts of these developments to be considered and that impacts on the nationally designated landscape should be assessed.

The AONB Partnership considers the decision on the location of the proposed convertor station site should consider the statutory purpose of the AONB. The AONB Partnership consider that convertor stations of the magnitude proposed would not contribute to the delivery of statutory purpose of the AONB. Therefore, sites for converter stations in the AONB or in the setting of the AONB should not be taken forward, including convertor station search area site 1.

It acknowledges that the project's proposer adheres to the draft EN-5 to underground cables through the AONB but consider the construction processes involved will lead to adverse impacts on the AONB during construction.

The AONB Partnership is aware of several other Nationally Significant Infrastructure Proposals impacting on the AONB. While recognising the that the proposer of this scheme is engaging with other project proposers the AONB partnership considers the need for the cumulative impacts of these developments to be considered and that impacts on the nationally designated landscape should be assessed.

While the AONB Partnership is not responsible for the defined Heritage Coast it has many shared aspirations. Heritage coasts were set up to protect undeveloped coastline and proposals such as those for EuroLink have the potential to negatively impact the defined Heritage Coast. The AONB Partnership considers that any assessment of impacts on the AONB should be mirrored by similar assessments on the qualities of the Heritage Coast.

The AONB Partnership promotes the 55 mile Suffolk Coast Path and welcomes the imminent opening of part of the England Coast Path that will aloe further enjoyment of the AONB. Proposals for EuroLink have the capacity to negatively impact people's enjoyment of the AONB by significant development during the construction phase impacting its defined natural beauty qualities.

The Suffolk Coast & Heaths AONB Partnership considers 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.

- 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 EN-5 that the proposed development should pay regard to AONB purpose.

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 National Grid Ventures is a statutory undertaker and 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 National Grid Venture's proposals for development are required to meet the aims of the AONB Management Plan.

The AONB Partnership recognise five elements of interest in the proposals from the consultation that it will comment on:

- i) Landfall**
- ii) Cable routes**
- iii) Converter stations**
- iv) Substation**
- v) Socio-economic impacts**

Three elements of the proposals are considered below:

i) Landfall

The AONB Partnership note that all landfall sites in the proposals are in the nationally designated landscape. It considers that landfall sites do not have to be in the AONB and that alternatives should be sought. If a landfall site within the AONB is chosen this will inevitably cause harm to the AONB during the construction phase due to the necessity to install underground cabling through the nationally designated landscape.

National policy dictates that major development should be does not contribute to the natural beauty or the ability of AONBs to meet its statutory purpose to conserve and enhance natural beauty.

National Planning Policy Framework para 176 states:

...applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances

The AONB Partnership does not consider that there are exceptional circumstances relating to the current proposals it is not fundamental to the schemes that landfall needs to be in the AONB for the successful delivery of the project.

It suggests that landfall sites outside the AONB are available and that the selection of those would avoid the potentially significant negative impacts of any converter stations and the likely significant negative impacts from the cable route construction.

The AONB Partnership is aware of the concerns of particular landowners relating to the proposals for landfall and associated cable routes having a significant negative impact on the ability of their land to deliver its current purpose. These concerns should be assessed and where the proposals are not able to be adapted to allow delivery of its current function those proposals should not be taken forward.

The AONB Partnership considers that National Grid Ventures should:

- Avoid a landfall site within the AONB.
- If the schemes proposer continues with landfall sites within the AONB to provide evidence that sites outside the AONB for landfall were considered, to fulfil policy drivers relating to major development within nationally designated landscapes, and on what grounds these were dismissed.
- Avoid, minimise, compensate and mitigate any negative impacts on the AONB during construction relating to landfall.

ii) Cable routes

The AONB Partnership notes the potential impacts on the nationally designated landscape from the proposed HVDC cables are proposed to be minimised by undergrounding through the AONB as presumed in the draft National Policy Statement EN-5.

It presumes that if a site in the AONB were to be taken forward that the undersea cable will be brought ashore via Horizontal Direct Drilling. It is not clear from the information shared whether this method of undergrounding cables will be used to take the cables to a convertor station. If there is to be a change to open trench technology within the AONB the AONB Partnership considers further damage could be imposed on the AONB from this method during the construction phase.

The AONB Partnership note that the project's proposer has identified underground cable search areas. As all currently proposed landfall sites are within the AONB then it can be assumed that all cable routes will have a negative impact on the AONB and its ability to deliver statutory purpose during construction.

The AONB Partnership recognise the concerns of Partnership members in relation to cable routes leading to significant negative impacts on the ability of land to deliver its current purpose, temporarily during the construction phase and longer term during operation and beyond phases due to changes to drainage patterns and disturbance of sub surface strata.

The AONB Partnership considers:

- That undergrounding cables in the AONB is a policy requirement.
- That the impacts during the construction of underground cables will have a negative impact on the AONB and its ability to deliver statutory purpose.
- That underground cabling achieved via the open trench technology will have a greater negative impact on the AONB than Horizontal Directional Drilling during the construction period.
- That micro siting of the preferred cable route should have as a priority the avoidance of negative impacts on the AONBs defined natural beauty, including natural heritage (wildlife interests) and cultural heritage (archaeological interests).
- That where damage to the AONB's defined natural beauty during the construction of underground cabling should be compensated and mitigated for. For the avoidance of any doubt, it does not consider undergrounding cables in the AONB to be compensation and mitigation as that is a policy requirement.
- That the delivery of underground cabling will have a negative impact on public enjoyment of the AONB and residents.

iii) Convertor stations

The AONB Partnership would draw the proposer's attention made earlier in this response that alternative landfall options, outside the AONB, should be preferred. This would reduce further impacts on the AONB from associated development such as might accrue from convertor stations.

The AONB Partnership considers that the choice of convertor stations should be driven by the need to avoid impacts on the nationally designated AONB, including impacts from development within the setting of the AONB as dictated by policy. It recognises sites 3,4 and 5 are located some distance from the AONB but that site 1 is in the setting of the AONB.

The AONB Partnership considers is that site 1 at Aldeburgh is not acceptable due to its location in the setting of the AONB.

This site is highly constrained as it is situated in gently rolling countryside within the setting of, and on two sides adjacent to, the Suffolk Coast & Heaths AONB on the outskirts of Aldeburgh, to the north of Hazelwood Hall.

It is wholly within the Estate Sandlands landscape of the Suffolk LCA. It is typical of that landscape, consisting of a pattern of regular late enclosure fields, plantation woodlands and coverts, characteristic of that landscape type. Whilst the general pattern of the landscape appears to have remained

reasonably intact since the 1st edition Ordnance Survey, there have been some modifications to the field pattern and alignment of footpaths.

The site appears to be elevated by at least 10m relative to the A1094, which runs along the northern side of the boundary of the Suffolk Coast and Heaths AONB. The site is within 2km of the Alde-Ore Estuary SSSI and RAMSAR sites, the Sandlings SPA, North Warren RSPB Reserve, Snape Warren SSSI, the Alde-Ore & Butley Estuaries SAC to the south, and further smaller SSSI sites. It is adjacent to Great Wood, an ancient woodland.

The AONB Partnership considers that such development should not be considered in the setting of the nationally designated landscape.

The AONB Partnership is aware and considers it vital for the project proposer to work with proposers of other nationally significant energy schemes to co-ordinate work to minimise damage to the AONB and beyond.

While the AONB Partnership does not consider this type of development appropriate for a nationally designated landscape it considers that any locations outside the AONB should consider the needs of wildlife, landscape, historic features, public and residential amenity, access, flood risk and should listen to professionals and residents' views when identifying sites to be considered.

The AONB Partnership considers that:

- The proposed site 1 for a convertor station should be dismissed as it is adjacent and in the setting of the AONB and other sites that do not have a significant impact on the AONB have been identified.
- Coordination with proposers of other schemes is required with a view to minimising negative impacts on the AONB and surrounding countryside.
- Convertor stations are large structures to locate without causing significant negative landscape impacts. The proposers of the scheme should seek to minimise the scale of the buildings as much as possible and limit those impacts as far as possible by landscaping, use of colour in design, minimise external lighting and listening and acting on concerns of residents and interests.

iv) **Substation**

While recognising the legitimate concerns of those impacted by the proposed Friston substation the AONB Partnership's remit relates to the designated AONB and its setting.

The AONB Partnership considers that:

- The impacts on the AONB from the option to connect to the proposed Friston substation accrue from the all the landfall options being in the nationally designated landscape and the associated impacts during construction of underground cables to get to convertor stations and then on to the substation.
- Impacts accruing in this way should be avoided, minimised, compensated and mitigated for.

v) Socio-economic impacts

In addition to landscape and wildlife impacts the proposers should consider the impact on the AONB's cultural heritage. The AONB has significant cultural significance including those relating to the works of composers, such as Benjamin Britten, artists such as Maggi Hambling, M W Turner and Walter Crane, poets such as George Crabbe and numerous photographers including the contemporary Gill Moon.

The AONB Partnership considers that the proposer of the project considers the economic impacts of its project and on the tourism industry and residents' quality of life.

Whilst it is not the role of the AONB Partnership to promote the visitor economy, that economy is a vital part of the functioning of a thriving protected landscape The AONB, as a designation, 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 cultural heritage features.

Furthermore, residents in the AONB enjoy benefits associated with AONB natural beauty and special quality indicators. Resident's quality of life is enhanced by the statutory purpose of the AONB.

The AONB Partnership considers that:

- If the projects proposer takes forward a landfall site in the AONB that the construction phase for undergrounding cables will have a negative impact on the ability of the AONB to deliver statutory purpose. If site 1 is selected as a convertor station this will cause further damage to the AONB by introducing major development into the setting of the AONB. This is likely to have a negative impact on the areas tourism industry and residents' quality of life. These impacts should be avoided, minimised, mitigated and compensated for.

Yours sincerely,



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AONB Manager

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