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By email only:

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**Suffolk Coast & Heaths AONB Partnership response to:
Five Estuaries Offshore Wind Farm Statutory Consultation March to May 2023**

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 and 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 acting 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:
Five Estuaries Offshore Wind Farm Public Consultation March to May 2023**

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 to March 2023)
- Various Pre Consultation Expert Topic Group meetings
- Five Estuaries Offshore Wind Farm, Preliminary Environmental Information Report: Non-Technical Summary
- Five Estuaries Offshore Wind Farm Preliminary Environmental Information Report Vol 6 Annex 10.2: Seascape, Landscape and Visual Viewpoint Assessment

Summary of AONB Partnership response Five Estuaries Offshore Wind Farm Statutory Consultation March to May 2023

- The AONB Partnership has concern about the impact that the offshore element will have on the nationally designated landscape.
- The AONB Partnership considers the impacts on the nationally designated landscape will be more fully understood following the publication of an update of the Suffolk Seascape Sensitivity Study (2020), commissioned by Suffolk County Council, East Suffolk Council and the AONB Partnership. It is not available in the timeframe available for this consultation. The findings of that study will inform the view of the AONB Partnership and communicated to the project proposers as soon as reasonably possible.
- The AONB Partnership considers there is an increase in industrialisation of views from the nationally designated landscape when looking out of the AONB towards the sea, including an increasing the 'curtain effect' of offshore industrial development.
- 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. At the time of writing National Policy Statements are under review but it is noted that the transitional arrangements are:

While the review is undertaken, the current suite of energy NPS (or for nuclear development the position set out in the Written Ministerial Statement of 7 December 2017) remain relevant government policy and EN-1 to EN-5 have effect for the purposes of the 2008 Act.

The Secretary of State has decided that for any application accepted for examination before designation of the updated energy NPSs, the original suite of energy NPS should have effect.

From Consultation Response Planning for New Energy Infrastructure a Dept for Energy Security and Net Zero, March 2023

The AONB Partnership notes the applicable National Policy Statements state:

- 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 four elements of the proposal from the consultation:

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

The four elements are considered below:

i) Offshore Proposals

The AONB Partnership recognises that the offshore element is at least 37km from shore. It notes that the height of the proposed turbines may rise to 420m above mean high water. It considers that there will be an increase in the 'curtain' effect from more turbines and associated infrastructure off the coast.

It notes the scheme's proposer considers there will be no significant effects on seascape, landscape and visual amenity from the project. However, the AONB Partnership consider that the updated Suffolk Seascape Sensitivity Study commissioned by Suffolk County Council, East Suffolk Council and the AONB Partnership should be used to inform the assessment of impacts on the nationally designated landscape. This report is not available in time to inform this response but will be used to update any further response from the AONB Partnership.

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. In particular an assessment of the proposals on the defined features of landscape quality, scenic quality, relative wildness and relative tranquillity.

The AONB Partnership considers the impacts on the nationally designated landscape will be more fully understood following the publication of an update of the Suffolk Seascape Sensitivity Study (2020), commissioned by Suffolk County Council, East Suffolk Council and the AONB Partnership. It is not available in the timeframe available for this consultation. The findings of that study will inform the view of the AONB Partnership and communicated to the project proposers soon as reasonably possible.

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.

Until assessments are undertaken of impacts on the AONBs defined qualities, and not just the viewpoint assessment, the AONB Partnership will reserve its judgement on the impacts on the AONB.

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 that organisations 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 note that the Onshore Sub Station will be visible, albeit very limited) during operation in the Dedham Vale AONB (Paragraph 2.7.21 Preliminary Environmental Information Report: Volume 3, Chapter 2 Landscape and Visual Impact Assessment, para 2.7.21

The AONB Partnership seeks to understand how this visual intrusion will be avoided, minimised and mitigated for.

iii) Cable Routes Proposals

The AONB Partnership recognises the proposals to have landfall outside the nationally designated AONBs and that the necessary cables from landfall to the substation will be placed underground. It considers this will minimise any negative impacts on the nationally designated Suffolk Coast & Heaths and Dedham Vale AONBs.

The AONB Partnership consider to minimise the negative impacts on the nationally designated landscape from the construction and operation of the underground cable routes the scheme’s proposer should:

- Ensure 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.
- Ensure that 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.
- Ensure the works minimise impacts on wildlife, particularly those habitats that provide a refuge for species that move in and out of the AONB and for individual species that may be transient populations that move in and out of the AONB.

iv) Socio-economic impacts

The AONB Partnership notes that there does not appear to be an assessment of impacts from the proposals on the tourism industry within the AONBs in the Preliminary Environmental Impact Report: Volume 3, Chapter 3: Socio-Economic, Tourism and Recreation.

The outstanding landscapes of the AONBs provide a canvas for a significant amount of tourism as outlined below, taken from figures in 2021:

AONB	Tourism jobs (Full Time Equivalent)	Value of tourism (£)
Dedham Vale	875	52mn
Suffolk Coast & Heaths	2,921	168mn

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 impacting the AONBs is likely to have an impact on the tourism industry and should be assessed.

Yours sincerely,



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cc
Cllr James Finch, Acting Chairman of Dedham Vale AONB Partnership