

AONB Office
Saxon House
Whittle Road
Hadleigh Road Industrial Estate
Ipswich
IP2 0UH

6 July 2023

By email only:

contact@northfallsoffshore.com

**Suffolk Coast & Heaths AONB Partnership response to:
North Falls Offshore Wind Farm Statutory Consultation May to July 2023**

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership thank the proposers of North Falls Offshore Wind Farm for the opportunity to comment on their proposals as described in the Statutory Consultation 16 May 2023 to 14 July 2023. The AONB partnership understands the proposals are for:

- An Offshore Wind Farm, with up to 72 turbines and
- Up to 2 offshore substation platforms
- Inter array cables
- Three options for transmission infrastructure:
 - Option 1: Onshore electrical connection at a National Grid connection point within Tendring, Essex, with a project alone onshore cable route and onshore substation infrastructure.
 - Option 2: Onshore electrical connection at a National Grid connection point within Tendring, Essex, sharing all or part of an onshore cable route with separate onshore export cables with another project (such as Five Estuaries) where practicable.
 - Option 3: Offshore electrical connection supplied by a third-party electricity network provider. Such a connection will potentially be identified through the Offshore Transmission Network Review process.

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 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, Forest England, 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.

The AONB Partnership response will predominately confine itself to matters that have a direct impact on the nationally designated landscape, in line with its remit.

Suffolk Coast & Heaths AONB Partnership response to North Falls Offshore Wind Farm Statutory Consultation May to July 2023:

The AONB Partnership has formed its view on these proposals from information provided by North Falls Offshore Wind Farm Ltd from:

- The North Falls website on various occasions since autumn 2022
- Information shared by project proposer at working group meetings
- Discussion with AONB partners and others with knowledge of the proposals
- Attendance at public information events

Summary Suffolk Coast & Heaths AONB Partnership response to North Falls Offshore Wind Farm Statutory Consultation May to July 2023

- National policy indicates proposers of such schemes need to pay regard to the statutory purpose of the AONB.
- The AONB Partnership consider that the applicant's description of the implications of the Offshore Above-Sea Development for the Suffolk Coast & Heaths AONB (29.6.2.2.2, Offshore Seascape, Landscape and Visual Impact Assessment) refers to the baseline description in the 2013-2018 Suffolk Coast & Heaths AONB Management Plan and not the current 2018-2023 Suffolk Coast & Heaths AONB Management Plan. It considers that this is not a sufficiently robust enough approach to assessing potential impacts on the AONB. It suggests that the assessment should be made against the more recent Suffolk Coast & Heaths Area of Outstanding Natural Beauty Natural Beauty and Special Quality Indicators v1.8 November 2016
- The Seascape and Offshore elements of the proposals would have significant negative impacts on the statutory purpose of the AONB if built out as described. Impacts on the AONBs could be reduced if the proposals were altered.
- The onshore elements, including cable routes, as proposed appear to have minimal negative impacts on the Suffolk Coast & Heaths AONB and no significant effects on the Dedham Vale AONB.
- The offshore proposals as described are likely to have a negative impact on the AONBs tourism economy and quality of life for residents by impacting views from the nationally designated landscape.
- The proposers of the scheme should listen, understand and act upon legitimate concerns of residents, interest groups and businesses outside the AONB, which this response does not cover.
- The AONB Partnership acknowledge the benefit that offshore wind generated electricity can bring to meeting the aspiration for net zero.

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 EN5 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 North Falls Offshore Wind Farm Ltd is a statutory undertaker and as such 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 North Falls Offshore Wind Farm Ltd proposals for development require the proposals to meet the aims of the statutory AONB Management Plan.

The three elements of the proposals of interest to the AONB Partnership are:

- i) Offshore Proposals**
- ii) Onshore Proposals (Landfall and cable routes)**
- iii) Socio-economic impacts**

Each of the above is considered below:

i) Offshore Proposals

The AONB Partnership recognises that the offshore element is at least 22.5km from the nationally designated landscape across uninterrupted views.

The proposed array, 40 turbines of 397m to tip (worst case for SLVIA), or 72 turbines at 310m to tip are proposed to be in front of the smaller turbines of the Greater Gabbard and Galloper arrays (when viewed from the AONB).

Although the preliminary environmental information report indicates the impacts on the AONB are assessed as moderate (also significant in Environmental Impact Assessment terms) the Partnership considers that these impacts may be underrepresented and consider that the proposer of the scheme consider the findings of the Update Addendum of the seascape sensitivity to offshore wind farms commissioned by Suffolk County Council, east Suffolk Council and the AONB Partnership.¹

As the proposed turbines will be larger and in front of (when viewed from the AONB) arrays, the negative impact of industrial infrastructure on the nationally designated landscape will be increased.

It considers the northern array, despite being smaller in area and closer to the AONB, will have a disproportionately large impact on the nationally designated landscape.

The extent of the proposed array, in particular the north-south extent, will increase the curtain effect of turbines across the views to the east from the AONB. This is a negative impact on the AONB. This proposal, existing arrays and proposed arrays will have a negative impact on the nationally designated landscape due to this expansion of the curtain effect. These impacts have been described as significant (major) in the preliminary environmental information report.

The AONB Partnership consider that the applicant's description of the implications of the Offshore Above-Sea Development for the Suffolk Coast & Heaths AONB (29.6.2.2.2, Offshore Seascape, Landscape and Visual Impact Assessment) refers to the baseline description in the 2013-2018 Suffolk Coast & Heaths AONB Management Plan and not as stated the current 2018-2023 Suffolk Coast & Heaths AONB Management Plan.

¹ <https://www.suffolkcoastandheaths.org/wp-content/uploads/2023/06/Suffolk-seascape-sensitivity-to-wind-farms-update-final-w-060623.pdf>

It considers that this is not a sufficiently robust enough approach to assessing potential impacts on the AONB. It suggests that the assessment should be made against the more recent Suffolk Coast & Heaths Area of Outstanding Natural Beauty and Special Quality Indicators v1.8 November 2016. ²

The AONB Partnership considers that the proposals will have a significant adverse impact on the AONB.

The AONB Partnership has considers 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 and not the summary landscape character assessment as referenced in 29.6.2.2.2, Offshore Seascape, Landscape and Visual Impact Assessment.
- The proposed turbines are proposed to be significantly larger (to tip) than the current turbines in this vicinity and closer to the AONB meaning that the impact of the industrialised development on the nationally designated landscape is greatly increased.
- The larger turbines at the front of the arrays will cause a disproportionate negative impact on the AONB and that the array should be re-designed to remove the situation where larger turbines are located closer to the AONB. There is particular concern relating to the northern array.
- The extension in the southern section of the proposals will greatly increase the curtain effect of development on those experiencing the AONB and the proposed England Coast Path and current Suffolk Coast Path.
- The two 'triangles' in the northern array of the proposals will have a disproportionate negative impact on the AONB compared with the benefits accrued from generating more sustainable electricity from this section of the proposed development and should not be included in current proposals.
- An assessment of impacts on the AONB should include assessments at different times of day, different times of the year and in different weather conditions.
- Night-time tranquillity will be negatively impacted by the introduction of navigation/safety lights in night-time skies.
- The introduction of two offshore substations will add to the industrialisation of the seascape when experienced from the AONB.

The Partnership considers that proposals as presented will have **significant negative impacts on the AONB during operation and may have such an impact on it that they may undermine the reasons for designation**. As no mitigation is available, compensation for residual impacts should be made.

² <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath.pdf>

ii) Onshore Proposals (including landfall and cable routes)

The AONB Partnership recognises that the proposals for landfall of the undersea cables is not within the nationally designated landscapes but considers that North Falls Offshore Wind Farm Ltd should listen, understand and act upon concerns of those impacted.

The AONB Partnership recognises that the proposals for underground cables linking landfall to the site of the proposed substation avoid the nationally designated landscapes but considers that North Falls Offshore Wind Farm Ltd should listen, understand and act upon concerns of those impacted.

It notes that routes should be identified that do the minimum of damage to sites important for nature, including woodlands and hedgerows and known archaeological sites. Likewise, given the considerable impacts of undergrounding cables, routes should be chosen to minimise impacts on dwellings and the best quality agricultural land.

The AONB Partnership recognises that the proposals for a substation are outside any nationally designated landscapes. It is proposed for being within 1km from the Dedham Vale AONB boundary and perhaps more than 3km from the Suffolk Coast & Heaths AONB boundary.

It recognises that the site selection principles include seeking to minimise significant impacts on AONBs as well as other criteria including residential areas, woodland and important ecological and heritage designated areas.

The AONB Partnership welcomes the avoidance of the nationally designated AONBs for its onshore proposals.

iii) **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 the relationship between seascape and setting of the AONB in horizon views from within the designated landscape.

The AONB Partnership, Suffolk County Council and East Suffolk Council commissioned Update Addendum, Seascape Sensitivity to Offshore Wind Farms³ notes an additional paragraph in EN-3 that includes:

seascape is an issue for consideration especially where it provides the setting for a nationally designated landscape and supports the delivery of the designated area's statutory purpose [Para 3.8.221 EN-3].

The AONB's landscape quality, tranquillity and natural cultural heritage features are also drivers for the tourism industry.

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

The AONB Partnership consider that the introduction of significant industrial development off the coast of the AONB will have an impact on the ability of the AONB to deliver statutory purpose. This impact will have a knock on effect on the viability of the tourism industry and residents' quality of life during operation and construction and should be avoided compensated for.

Yours sincerely,



Simon Amstutz
AONB Manager
For and on behalf of the Suffolk Coast & Heaths AONB Partnership

simon.amstutz@suffolk.gov.uk
07971 909 649

³ <https://www.suffolkcoastandheaths.org/wp-content/uploads/2023/06/Suffolk-seascape-sensitivity-to-wind-farms-update-final-w-060623.pdf>