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Scottish Power Renewables
East Anglia 1 North and East Anglia 2
Offshore windfarm proposals
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Dear Sir/Madam,

RESPONSE OF SUFFOLK COASTAL AND WAVENEY DISTRICT COUNCILS AND SUFFOLK COUNTY COUNCIL TO THE STAGE 1 CONSULTATION BY SCOTTISH POWER RENEWABLES ON THE EAST ANGLIA 1 NORTH AND EAST ANGLIA 2 OFFSHORE WIND FARMS

The local authorities welcome the opportunity to comment formally and publicly on the proposals for the third and fourth phase of offshore wind farm developments forming the East Anglia Array.

We have participated fully in the previous process for the East Anglia 1 offshore windfarm (currently under construction) and the East Anglia 3 offshore wind farm (consented) and we look forward to continuing to co-operate in discussions for East Anglia 1 North and East Anglia 2.

It is understood that the consultations are taking place concurrently but the two projects will separate and be considered independently of each other in due course. These comments equally apply to both projects as currently presented for consideration in the Public Information Days (PIDs) in March 2018.

The timing of the PIDs is accepted given the requirement to access the maximum local population. However, the absence of printed information to take away and digest is a disappointment given this is intended to be a formal round of public consultation.

In addition, branding the event as information days has taken away some of the formality of the process and is not necessarily clear that this is a stage 1 consultation requiring input from the local population. It is considered that this could have been made clearer in the feedback forms. It is noted that of the 10 questions in the feedback form, only three relate to the impact of the scheme, the rest relate to the process of consultation. It is not clear whether those not attending the exhibitions would have readily found any information on the subject or known when to reply.

The local authorities have been considering these proposals for some time in pre-application discussions and have made representations to SPR in relation to the project. However, not all of these previously raised considerations have made it to the PIDs so it is considered appropriate for the local authorities to publicly raise their concerns and considerations in relation to the proposal to connect both of the offshore windfarm projects at Sizewell to connect to the National Grid Power lines.

Alongside considering SPR's proposal, the local authorities have been made aware via National Grid's TEC register of the offer for two inter-continental connectors – Eurolink and Nautilus - to be connected to the National Grid at Sizewell. Having reviewed other such developments across the country, the local authorities are aware of the associated infrastructure required to facilitate two such proposals including a substation connection to the grid lines and converter stations for each cable. These connectors will cross the North Sea and connect into Belgium and the Netherlands. From connection dates given it can be estimated that there will be a crossover in onshore construction of the inter-continental connectors with the offshore wind farm proposals. In addition, all four of these projects will crossover from a construction phase perspective with construction of the new nuclear power station at Sizewell C, given the recently estimated dates for that project. This is a significant concern for the local authorities and the proposals are all of such a scale and magnitude that they cannot be considered in isolation as independent proposals. The implications for the local population and East Suffolk as a whole are significant too.

Site Selection process

The exhibitions demonstrate a site selection area for the onshore elements of the project. This study area includes sites within and adjacent to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).

There are a number of principles that the local authorities would wish to see adhered to in the site selection and mitigation for the onshore elements of the project and these are:

- 1) Site selection should seek a location / locations which minimises visual harm to the landscape, recreational, and residential receptors. This may be achieved through:
 - a) A close visual relationship to the existing built environment;
 - b) The screening by existing blocks of woodland or belts of trees;
 - c) A location that offers the ability to minimise the need for the additional building height required by noise attenuation structures;
 - d) The minimisation of bulk and height of the structure(s);
 - e) The minimum footprint required; and
 - f) Careful design of the structure(s).

- 2) Sites both inside and outside the AONB should be properly considered. Although in policy terms a site outside the AONB is to be preferred; in the first instance the approach should also be to minimise the degree of harm or impact on public and

residential amenity, landscape character and heritage assets notwithstanding the boundary of the AONB.

- 3) The local authorities would expect sites within both the east and west of the site selection zone to be considered in detail.
- 4) Where additional soft landscaping is required to mitigate the visual and amenity impacts of the project it is suggested the following are appropriate;
 - a) Recessive colouring and simplicity of form and design;
 - b) Meaningful lowering of the floor level of the building given the opportunities offered by a free draining substrate; and
 - c) An unlit structure, unless staff are present on site, with the use of Low Light surveillance or IR lighting to provide security.

Notwithstanding the above principles, the local authorities have significant concerns with the limiting of the site selection area as illustrated and considered by SPR, the non-inclusion of EDF Energy owned / controlled land to the north of the identified onshore study area has not been included – north of Sizewell Gap Road (land owned by EDF Energy). It is considered that this piece of land adjacent to the Greater Gabbard and Galloper offshore wind farm substations, offers an opportunity to site onshore infrastructure in close proximity to similar infrastructure in a location already screened by landscaping with potential for additional screening.

In pre-application discussions, local authority officers have requested in writing that SPR should extend the area of search for a connection site beyond the area defined to date and we still consider this to be appropriate. The request was made to ensure that all reasonable options to accommodate the projects were considered, having particular regard for the need to minimise harm and identify a site which could accommodate both SPR and the inter-continental connector projects alongside each other in order to minimise the overall impact of the proposals.

In the absence of satisfactory evidence in relation to the suitability or unsuitability of the site north of the Sizewell Gap Road, the local authorities consider that in this respect the site selection process to date is inadequate and flawed.

The proximity of parts of the eastern side of the search area to existing development – major energy infrastructure, is considered a potential positive, therefore extending the site selection zone to include the fields to the north of the Sizewell Gap Road in close proximity to the Greater Gabbard and Galloper substations and with the back drop of Sizewell A and Sizewell B could be a more appropriate setting for the large structures required for the onshore substations to service SPR's projects and the converter stations required for the inter-continental connector projects. Therefore, the local authorities consider that land both north and south of Sizewell Gap Road should be evaluated as a potential location, as set out below.

Next steps required for the selection of a site

The local authorities consider that further work is required to inform site selection within the current or the extended search area that is:-

- 1) A detailed examination of the impacts of the preferred east and west options *and* their associated cable corridors in terms of both construction and operation. This should cover a range of issues, (such as transport, ecology, noise, landscape historic environment etc.) to be agreed in advance with the local authorities and other statutory consultees. It is important that the cable corridor can accommodate both SPR and National Grid projects. If this cannot be achieved or will present significant loss of amenity then those site options should be dismissed.
- 2) Evaluation of the findings, and selection of the initial preferred option on that basis.
- 3) Evaluation of this initial preferred option against the policies within the relevant National Policy Statements.
- 4) Identification of the preferred site in consultation with the statutory consultees

The current position of the local authorities based on the information presented to date

Notwithstanding the fact that the local authorities consider that further work is required to evaluate the siting options, they are conscious that SPR in particular have a very short time in which to make a final decision on this matter. Therefore in a spirit of clarity and cooperation they are prepared to set out their *interim* view and rationale at this stage.

Given the national status of the AONB's designation, the local authorities felt that it was important that the impact of development on alternative sites outside the AONB should also be tested. *Based on the information and discussions to date* and being mindful of the need for both SPR and the inter-continental connector projects to connect to the Grid, possibly and hopefully via the same connection substation, our views are:

Although the western sites are outside of the AONB, they are open countryside which is to be protected from development as detailed in Local Plan policy and the National Planning Policy Framework. The question then needs to be tackled of whether the overall harm to the environment of developing the sites to the west exceeds that of the eastern sites, including their AONB status. In addition, siting to the west of the search area will involve the construction and creation of a longer cable corridor, (the detail of which we do not yet have), and the loss of woodland to the south of a Grade II listed building. Having reviewed the proposals to take out the woodland to the south of Aldringham Court, Grade II listed building, we do have serious concerns on the adverse impact of this on the setting of the listed building. Full details are included at the end of this letter.

In addition, to date there has been no detailed ecological, landscape, archaeological, heritage asset or other constraints assessment of accessing either the eastern or western sites in the site selection area and this has limited our ability to comment in full on the suitability of any site to date. However, if the destruction of the woodland is the only acceptable location to access the west, then as local authorities, we would have great difficulty in supporting a route through to the western sites at this location.

It is considered that the eastern sites within the study area in close proximity of the existing buildings of Sizewell A (being decommissioned) and Sizewell B (in operation) and the Greater Gabbard and Galloper substations may be preferable to the western sites which are more open and rural / agricultural in their nature. The opportunities for screening potential are more limited in the western area given the existing landforms.

There is a balance to be struck between the impact of extensive new development in the open countryside in a rural area and the creation of new development within the AONB. At this stage, there is not enough information provided to give a fully justified opinion on whether east or west would be more appropriate but currently, on the basis of information to date, the impact on the open countryside to the west is potentially more detrimental than the impact on development within the east given potential mitigation and screening methods that could be available.

Furthermore, it is apparent that construction of a cable route to the west that has the capacity to accommodate all projects carries with it significant additional technical challenges. Given the sequencing of the projects the local authorities have not been given any confidence that all projects could be accommodated and consider there is a risk that a second grid connection would be required, or more likely that it would not be possible to parallel the cable corridors for the two SPR and the two inter-continental connector projects along their entire length, especially at the Aldeburgh Road pinch point.

It is the current position of the local authorities that eastern sites adjacent to the Sizewell Gap Road should, despite their location within the AONB, be incorporated in SPR's site selection zone and properly assessed and considered.

The locations adjacent to the Sizewell Gap Road still require further investigative work and while no conclusions have been reached, they could:

- Minimise the impacts of construction and operation of the site and the cable corridor on local communities and public/ residential amenity - although there would be additional challenges in sharing a construction route with EDF Energy construction traffic for Sizewell C and this would need to be mitigated and potentially compensated for.
- Minimise the permanent loss of habitat and the severance of ecological corridors. However, further work on this, including any habitat mitigation or compensation that may be required, will be needed.

- Minimise harm to both archaeological features and the setting of historic assets, additional work on cable runs and their exact siting will be required to explore this further.
- Minimise the technical risks to the delivery of a shared connection and joint siting of all projects, subject to further information and detailing relating to all of the proposals.
- Minimise the magnitude of landscape change at the connection site given the presence of an existing energy cluster of a comparable scale. This is a key advantage which sites on the western side of the site search area do not have in comparison.
- Offer opportunities for dense planting of conifers which provide comparatively rapid and effective screening and the opportunity to modify the landform to dig in the structures. This would be appropriate for both the character of area and the sandy soil type.
- Possibly offer opportunities to utilise soil which will need to be stripped from EDF Energy land as part of the Sizewell C development for bunding purposes.
- Utilise the higher background noise environment which already exists close to Sizewell B, Greater Gabbard and Galloper substations.
- Utilise the better road network close to Sizewell to reach any haul roads and the new substations during the operational phase.

The local authorities' current position is that we cannot support any of the western or eastern sites put forward on the basis of information received to date. They would all have significant visual, landscape, and economic impacts alongside heritage impacts, archaeological impacts and ecological impacts not yet fully considered by the project.

Yours faithfully,

Cllr Geoff Holdcroft

Deputy Leader and Cabinet Member for
Economic Development
Suffolk Coastal District Council

Cllr Tony Fryatt
Cabinet Member for Planning
Suffolk Coastal District Council

Cllr Matthew Hicks

Cabinet Member for Environment,
Public Protection and Broadband
Suffolk County Council

PLEASE SEE OVER

Full details of the conservation concerns:

Aldringham Court was Grade II listed in 2005 and is a large house that was designed and built by the C20th Suffolk architect Cecil Lay (1885-1956) for his mother (and originally named Raidsend) in 1912-14. The list description identifies the house as '*probably his finest creation and is of special interest for the survival, little altered, of the exterior, an imaginative essay in an unusual art nouveau style with much fine-quality decoration*'. Aldringham was the birthplace of Lay and most of his buildings are in the locality. He was articled to the well known Suffolk architect J S Corder and studied in France and Belgium. Lay was responsible for some of the town planning of nearby Leiston as well as for the restoration of Aldeburgh parish church. Lay is, therefore, an architect of great local importance. Aldringham Court is basically an E-plan with sub-Dutch gables, striped and chequered brickwork decorative details and stucco decoration. It is currently a nursing home.

The significance of Aldringham Court is derived from its designer's local importance; it's an unusual and rare illustration of the Art Nouveau in Suffolk; its plan form; its distinctive features including decorative brickwork, stucco, windows and details; and its garden setting including woodland.

The site's location adjacent the Hundred River is historically significant as rivers so named formed the boundaries between the Hundreds, which were Saxon-era administrative units. Indeed, Hodskinson's map of 1783 shows the river as a parish boundary and it partly so remains today. The parish church, a common and identified tumuli are all apparent within the vicinity of this site at the parish edge and this is significant for potential archaeology.

Historic map regression suggests that the site of Raidsend was not previously developed and had been heathland typical of the Suffolk sandlings. When the site was developed by Lay the existing enclosed area became the new garden curtilage and appears to have been intentionally planted with trees to provide a degree of privacy along Aldeburgh Road and a setting to the substantial house, in contrast to the former open heath. When viewed today, the character of the building is expressed as a minor gentry house within a well tree-ed setting that provides glimpsed views from Aldeburgh Road. Its status is signified by impressive gate piers at the vehicular entrance.

On these bases, therefore, it is judged that the existing woodland surrounding Aldringham Court contributes importantly to its significance and that this importance is derived from the evidence that its planting is substantially contemporary with the design and construction of Raidsend and, thereby, forms part of its design as its garden setting. Any proposal to remove the woodland would cause harm to the significance of the designated heritage asset that is the listed building. For listed buildings, s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess. The duty is engaged when the planning authority is considering whether to permit development which affects a listed

building or its setting. Therefore, even if a listed building is not directly affected by a proposed development, the duty will still apply if the development affects the setting of the building. In the case of *East Northamptonshire DC v Secretary of State* ('Barnwell Manor'), the Court of Appeal held that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise; and that a finding of harm to a listed building or its setting gives rise to a "strong presumption" against granting permission.

Full details of the archaeological concerns:

Data regarding known above and below ground heritage assets present within the onshore study area comes from information recorded within the County HER and from designated heritage assets.

The Hundred River flows throughout the study area, the majority of which is situated on light soils, meaning that this is a favourable location for archaeological activity from all periods. This is attested to by the multi-period finds scatters which have been recorded throughout the study area.

However, as the majority of the onshore study area has never been subject to systematic archaeological investigation, there is high potential for additional, and as yet unknown, important heritage assets to survive across much of this area. Some of these may be of national significance and worthy of preservation in situ. This has been clearly demonstrated by the East Anglia 1 offshore windfarm scheme, where a significant number of archaeological sites have been defined, the majority of which were not previously recorded on the County Historic Environment record, or associated with finds scatter or cropmark evidence which indicated the likely presence of surviving below ground remains.

Archaeological investigations immediately adjacent to the study area (mainly confined to the north around Leiston and Sizewell) have yielded extensive multi-period archaeological remains. This highlights that similar archaeology is likely to continue into the study area, particularly given the comparative soils and topography.

Below are specific comments relating to each of the proposed substation option sites and the suggested cable route, as per the published potential substation zones, as well as details of current known archaeological sites recorded within each of the option areas:

W1

Known sites within the option area:

KND 010 Grove Wood ancient woodland

KND 007 A ring ditch cropmark situated south of Grove Wood which may be the remains of a prehistoric burial mound (potential for associated human remains)

KND 017 Ring ditch cropmark likely to be the site of a post mill

KND 023 Roman and medieval coin scatter

KND 009 Ruined chapel site marked on early maps (potential for associated human remains)

Finds scatters of Roman, Saxon, medieval and Post-Medieval date identified through metal detecting

As such, there is high potential for multi-period archaeological remains across option W1, particularly within the eastern half of this area given its position on light soils overlooking the Hundred River. Sites which have the potential to be associated with human remains are particularly sensitive. Unknown earthwork features may also be present within Grove Wood and this historic landscape features should not be removed as part of the scheme.

The western half of option W1 is an area of early (pre 18th century enclosure). Any surviving early boundaries should be maintained.

Friston Church (II*) as well as Woodside farm and Church Walls (Grade II) are located to the south of this option. The impact of proposals upon the setting of these historic buildings needs to be assessed.

W2

Known sites within the option area:

KND 004 A Roman villa site to the north-west of Knodishall, identified through large scatters of Roman finds and building material (potential to be worthy of preservation in situ)

KND 013 Prehistoric finds scatter

There is high potential for significant archaeological remains across option W2, given the archaeology recorded within this area and its proximity to the Hundred River. A potential for preservation in situ of significant archaeological remains can already be identified for this option.

Option W2 is within an area of early (pre 18th C enclosure). Any surviving early boundaries should be maintained.

Knodishall Church (II*), Knodishall Place and Pattles Farm (Grade II) are located close to this option area. The impact of proposals upon the setting of these historic buildings needs to be assessed.

W3

Known sites within the option area:

KND 002 A Bronze Age axe

LCS 021 A cropmark of an undated enclosure

There is high potential for archaeological remains across option W3 given its position on light soils overlooking the Hundred River. There is a specific potential for medieval remains in association with Knodishall Church, however, recent archaeological investigations just to the north of this area at Johnson's farm have identified features of prehistoric, Roman and medieval date (LCS 221).

Option W2 is within an area of early (pre 18th C enclosure). Any surviving early boundaries should be maintained.

Knodishall Church (II*) and Knodishall Place (Grade II) are located adjacent to this option area. The impact of proposals upon the setting of these historic buildings needs to be assessed.

Cable route- west

The current proposed cable route, not yet clearly defined but assumed to be crossing the Aldeburgh Road at the woodland, will impact upon KND 017 (ring ditch cropmark likely to be the site of a post mill) and will potentially pass through areas where multi-period finds scatters have been recorded. It is also potentially located to the south of KND 003, a group of 9 upstanding tumuli on Coldfair Green. As a result of the recorded heritage assets in the vicinity of the route, as well as the fact that it follows the Hundred River through an area of light soils, the planned cabled route potentially passes through an area of high archaeological potential. However, as there has been very limited previous archaeological evaluation across the study area, there is high potential for previously unknown remains to survive along any chosen route.

Aldringham crossing

The crossing avoids current recorded archaeological remains, however, Scheduled barrow monuments are situated on other side of the river at Aldringham Common and so there is potential to encounter further archaeological remains at this location. This part of the cable route which potentially crosses the Hundred River also has palaeo-environmental potential.

E1

Known sites within the option area:

ARG 064 Aldringham Green

ARG 019 and 073 Cropmarks and scatters of medieval finds, likely to relate to an area of medieval settlement to the south-east of Aldringham

Scheduled round barrows are also recorded on either side of this option area on Aldringham Common and in Aldringham plantation

There is high potential for archaeological remains across option E1 given its position on light soils overlooking the Hundred River. There is a specific potential for medieval remains in associated with Aldringham Green and within the area of the recorded medieval finds and cropmarks. There is also potential for the remains of additional burial mounds to survive below ground within this area, given the proximity to other known monuments. If present, these monuments are likely to be associated with human remains.

E2

Known sites within the option area:

LCS 215 The site of a possible Bronze Age round barrow or medieval to post medieval mill mound surviving as a cropmark, to the east of Halfway Cottages

LCS 210 cropmarks of unknown date

ARG 017 A well preserved and extensive group of Second World War anti glider ditch earthworks at The Walks (surviving as below ground remains in cultivated areas).

LCS 213 A Second World War Diver anti-aircraft battery is visible as structures and earthworks on aerial photographs. The site was dismantled at the end of the war, but parts of the trackways still survive, as may some of the hardstandings.

There is high potential for archaeological remains across option E2 given its position on light soils close to the Minsmere River. Archaeological evaluations to the north of Sizewell Gap Road and to the south of Leiston have identified extensive multi-period archaeological remains (LCS 148/150, 161, 175, 218, 219 and 223), which are likely to extend into this area. Activity relating to occupation, industry, agriculture and burial has been identified during these works. Areas of heathland are likely to offer an excellent level of preservation for any surviving below ground remains. Extant earthworks and structures associated with WWII activity should not be disturbed by the scheme.

E3

Known sites within the option area:

ARG 028 and 029 former Second World War trenches

ARG 031 former WWII strongpoint and anti-aircraft battery

Scatters of prehistoric finds

There is potential for archaeological remains across option E3 given its position on light soils overlooking a tributary of the Hundred River. There is a particular potential for further military remains to be present, although there have been limited archaeological investigations in this part of the study area to inform assessments of potential.

E4

Known sites within the option area:

LCS 214 Cropmarks west of Sizewell common

ARG 018 Earthwork enclosure on Sizewell common

ARG 017 A well preserved and extensive group of Second World War anti glider ditch earthworks at The Walks

There is high potential for archaeological remains across option E4 given its position on light soils close to the Minsmere River. Archaeological evaluations to the north of Sizewell Gap Road and to the south of Leiston have identified extensive multi-period archaeological remains (LCS 148/150, 161, 175, 218, 219 and 223), which are likely to extend into this area. Activity relating to occupation, industry, agriculture and burial has been identified during these works. Areas of heathland are likely to offer an excellent level of preservation for any surviving below ground remains. Extant earthworks should not be disturbed by the scheme.