



FIVE ESTUARIES OFFSHORE WIND FARM

STATEMENT OF COMMON GROUND

10.10.3 SUFFOLK & ESSEX COAST &
HEATHS NATIONAL LANDSCAPE (BRAND
FOR AREA OF OUTSTANDING NATURAL
BEAUTY, AONB) PARTNERSHIP

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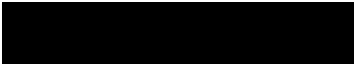
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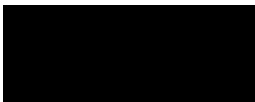
In preparation of this document Five Estuaries Wind Farm Ltd has made reasonable efforts to ensure that the content is accurate, up to date and complete for purpose.

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DEFINITION OF ACRONYMS

Term	Definition
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
ES	Environmental Statement
ETGs	Expert Topic Groups
MW	Megawatts
NSIP	National Significant Infrastructure Project
OnSS	Onshore Substation
SCHAONB	Suffolk Coast and Heaths AONB
SLVIA	Seascape, Landscape and Visual Impact Assessment
SoCG	Statement of Common Ground
VEOWF	Five Estuaries Offshore Wind Farm



1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared between Five Estuaries Offshore Wind Farm Limited (hereafter referred to as 'the Applicant') and Suffolk & Essex Coast & Heaths National Landscape Partnership to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Five Estuaries Offshore Wind Farm (hereafter referred to as "VEOWF").
- 1.1.2 The term Suffolk & Essex Coast & Heaths National Landscape Partnership is used as branding for the Suffolk Coast & Heaths AONB Partnership
- 1.1.3 Following detailed discussions undertaken between the parties, the Applicant and Suffolk & Essex Coast & Heaths National Landscape Partnership have sought to progress a SoCG. It is the intention that this document provides the Planning Inspectorate with a clear overview of the level of common ground between both parties. This document will be updated if any additional points are identified or any positions change during the Examination.

1.2 APPROACH TO SOCG

- 1.2.1 This SoCG sets out the topic, a brief summary of the issue or matter subject to agreement or disagreement, the position of the Applicant and that of Suffolk & Essex Coast & Heaths National Landscape Partnership, and a colour coding to illustrate the level of agreement and/or materiality.
- 1.2.2 A full description of the approach adopted is set out in 9.33 Approach to Statements of Common Ground [APP-266] submitted as part of the DCO application.

1.3 THE PROPOSED DEVELOPMENT

- 1.3.1 The Five Estuaries Offshore Wind Farm (VEOWF) is the proposed extension to the operational Galloper Offshore Wind Farm. The project includes provision for the construction, operation, maintenance and decommissioning of an offshore wind farm located approximately 37 kilometres off the coast of Suffolk at its closest point in the southern North Sea; including up to 79 wind turbine generators and associated infrastructure making landfall at Sandy Point between Frinton-on-Sea and Holland-on-Sea, the installation of underground cables, and the construction of an electrical substation and associated infrastructure near to the existing Lawford Substation to the west of Little Bromley in order to connect the development to National Grid's proposed East Anglia Connection Node substation, which would be located nearby.
- 1.3.2 All onshore connection infrastructure would be located in the administrative area of Tendring District Council, within Essex County Council. VE will have an overall capacity of greater than 100 Megawatts (MW) and therefore constitutes a Nationally Significant Infrastructure Project (NSIP) under the Section 15 (3) of the Planning Act 2008.



- 1.3.3 A full Project description is included in the Environmental Statement, in particular 6.2.1 Offshore Project Description [APP-069] and 6.3.1 Onshore Project Description [APP-083].



2 OTHER PARTY'S REMIT

2.1 OVERVIEW

- 2.1.1 The Suffolk & Essex Coast & Heaths National Landscape is an area of legally designated Area of Outstanding Natural Beauty, (AONB) including areas of countryside, towns and villages in East Suffolk and North Essex. The area was designated in 1970, under the National Parks and Access to the Countryside Act (1949). AONBs have a primary purpose of conserving and enhancing the natural beauty. There is a statutory duty of local authorities that have part of an AONB in their jurisdiction to formulate and review a management plan every five years. This statutory management plans sets out the local authority policy for the AONB, as described in section 89 of the Countryside and Rights of Way Act (2000).
- 2.1.2 The following application documents have informed the discussions with Suffolk & Essex Coast & Heaths National Landscape and address the elements of VE that may affect the interests of the interested party:
- > 6.2.10 Seascape, Landscape and Visual [APP-079]
 - > 6.7.10.1 Seascape, Landscape and Visual Methodology [APP-197]
 - > 6.7.10.2 Seascape, Landscape and Visual Viewpoint Assessment [APP-198]
 - > 6.7.10.3.1 to 6.7.10.3.26 Seascape and Landscape Visual Figures [APP-199 to APP-224]
 - > 6.3.2 Landscape and Visual Impact Assessment [APP-084]
 - > 6.7.2.1 Landscape and Visual Impact Assessment Figures [APP-180 to APP- 196].
- 2.1.3 The main areas of interest raised by Suffolk & Essex Coast & Heaths National Landscape were the following:
- > Impacts of the offshore element of the proposals on the Suffolk & Essex Coast & Heaths National Landscape.
 - > Impacts of the onshore proposals on the Dedham Vale National Landscape.
 - > Compliance with the Levelling-up and Regeneration Act (2023), specifically the strengthened duty placed on statutory authorities to seek to further the purpose of an AONB when decision making.
- 2.1.4 Suffolk & Essex Coast & Heaths National Landscape staff team and the Applicant have been working together to minimise possible impacts of the project on the Suffolk & Essex Coast & Heaths National Landscape.



2.2 CONSULTATION SUMMARY

- 2.2.1 Since 2019, the project has been engaging with relevant stakeholders through different levels of activity. The project has undertaken the necessary consultations before submitting the application and has held Expert Topic Groups (ETGs) on a number of specific topics, as well as bilateral meetings with key stakeholders. The Suffolk & Essex Coast & Heaths National Landscape has replied to the Stage 1 consultation and to the Section 42 consultation. The comments received and the meetings between the project and the interested party have informed the basis for this SoCG.



3 AGREEMENTS LOG

- 3.1.1 The following sections of this SoCG set out the level of agreement between the Applicant and Suffolk & Essex Coast & Heaths National Landscape Partnership for each relevant component of the Application identified in paragraph 2.1.3. The tables below detail the positions of the Applicant alongside those of Suffolk & Essex Coast & Heaths National Landscape Partnership and whether the matter is agreed or not agreed.
- 3.1.2 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion', the agreements logs in the tables below are colour coded to represent the status of the position according to the criteria in Table 3.1 below. Colours were chosen in order to ensure inclusivity for the visibility of data.

Table 3.1: Position Status key

POSITION STATUS	COLOUR CODE
The matter is considered to be agreed between the parties.	Agreed
The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	Ongoing point of discussion
The matter is not agreed between the parties.	Not agreed

Table 3.2: Status of discussions

Reference Number	Topic	Applicant's Position	National Landscapes Position	Position Status
SCH1	Adequacy of consultation -The adequacy of consultation with the Suffolk and Essex Coast and Heaths National Landscape Partnership regarding seascape, landscape and visual impacts to date.	The Applicant considers that the Suffolk and Essex Coast and Heaths National Landscape Partnership has been adequately consulted regarding seascape, landscape and visual impacts to date.	The Suffolk & Essex Coast & Heaths National Landscape Partnership has been adequately consulted regarding seascape, landscape and visual impacts to date.	Agreed
SCH2	Baseline environment - Whether the baseline environment of the Suffolk Coast and Heaths AONB (SCHAONB) has been adequately described in the Environmental Statement (ES)	The Applicant considers that Chapter 10 Seascape, Landscape and Visual Assessment [APP-079] adequately characterises the seascape, landscape and visual baseline environment, including the special qualities of the SCHAONB.	The Suffolk & Essex Coast & Heaths National Landscape Partnership considers that the description of the potential impacts of the scheme is best described against the Natural Beauty criteria (pars 10.11.179-10.11.280) rather than the special quality indicators that describe how people experience the National Landscape. It notes the applicant has drawn on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators document produced in 2016, and it considers that an accurate description of the AONB.	Agreed
SCH3	Assessment methodology - Whether the assessment methodology used for the SLVIA is appropriate, robust and in accordance with professional guidance.	The Applicant considers that the methodology used for the SLVIA in Chapter 10 Seascape, Landscape and Visual Assessment of the ES [APP-079] is appropriate, robust and in accordance with professional guidance.	The Suffolk & Essex Coast & Heaths National Landscape Partnership defers to Local Planning Authorities and Natural England on whether the assessment methodology is appropriate	N/A
SCH4	Compliance with the Levelling-up and Regeneration Act (2023) amended section 85 of the Countryside and Rights of Way Act (2000), which creates a new duty on relevant authorities to <i>'seek to further the purpose of conserving and enhancing the natural beauty of the area'</i> .	The Applicant is aware of the duty to seek to further the purpose of conserving and enhancing the natural beauty of the SCHAONB. The Applicant considers that it has sought to further the purposes of the SCHAONB through mitigation embedded in the project design relating to seascape, landscape and visual receptors as set out in Table 10.18 of 6.2.10 Seascape, Landscape and Visual Assessment [APP-079]. The Applicant considers that it has sought to avoid, reduce or minimise adverse effects where they arise, as far as the scope of the project allows.	The Suffolk & Essex Coast & Heaths National Landscape Partnership consider that the applicant is not fully in compliance with the amended section 85 of the Countryside and Rights of Way Act (2000). It considers the strengthened duty as active duty, to seek to further the purpose to conserve and enhance natural beauty and that offshore infrastructure does not fulfil that requirement. It acknowledges that the applicant has sought to minimise adverse impacts but considers there are residual negative impacts experienced by the AONB, which should be compensated for.	Not Agreed
SCH5	Impact of the offshore proposals on the nationally designated SCHAONB	The Applicant considers that the offshore proposals will not have significant adverse impacts on the natural beauty and special qualities of the SCHAONB (as set out in 6.2.10 Seascape, Landscape and Visual Assessment [APP-079] and that the statutory purposes for designation of the SCHAONB will not be compromised.	The Suffolk & Essex Coast & Heaths National Landscape Partnership consider that although the offshore element of the proposals have not been assessed as a significant impact, there is still an adverse impact from the offshore element.	Not Agreed
SCH6	Impact on the nationally designated SCHAONB from the onshore substation during operation	The Applicant considers that the onshore substation will not have significant adverse impacts on the natural beauty and special	The Suffolk & Essex Coast & Heaths National Landscape Partnership consider that the Onshore Substation is unlikely to have an impact on the Suffolk Coast & Heaths AONB.	Ongoing point of discussion



Reference Number	Topic	Applicant's Position	National Landscapes Position	Position Status
		qualities of the SCHAONB (as set out in 6.3.2 Landscape and Visual Impact Assessment [APP-084] and that the statutory purposes for designation of the SCHAONB will not be compromised. The Applicant has committed that the Onshore Substation will not have permanent night lighting, as set out in 9.4 Onshore Design Principles.	The Suffolk & Essex Coast & Heaths National Landscape Partnership welcome the lack of permanent lighting during the operational phase of the Onshore Substation	
SCH7	Impact on the nationally designated Dedham Vale AONB's defined indicators, relative tranquillity and relative wildness during construction of the onshore connection infrastructure	The Applicant considers that at 1.4 km the onshore construction activities for the proposals will not have an adverse impact on the. Dedham Vale AONB either from noise or construction lighting. Particularly with the controls set out in the Code of Construction Practice (CoCP) [REP1-041].	The Suffolk & Essex Coast & Heaths National Landscape Partnership consider that the Dedham Vale National Landscape Partnership should be consulted on this SoCG to give its view on this issue.	Ongoing point of discussion

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