Comment from FF3199C42 Suffolk & Essex Coast & Heaths National Landscape Partnership for Deadline 2

These comments are made by the Suffolk & Essex Coast & Heaths National Landscape Manager on behalf of the Suffolk & Essex Coast & Heaths National Landscape Partnership.

The comments relate to two documents:

- REP1-130 Suffolk County Council Local Impact Report
- REP1-120 Volume 9.47 National Landscape Section 85 Duty Technical Note

Considering REP1-130 Suffolk County Council Local Impact Report, the National Landscape consider that para 5.46 to 5.58 (relating to effects on designated and defined landscapes) accurately represent the potential impacts of the proposals on the nationally designated landscape and the legally defined Suffolk Heritage Coast.

To summarise the National Landscape considers that the effects during construction do not fully reflect the impacts on all defined features of the national landscape, including impacts on the defined scenic quality, relative tranquillity and relative wildness. The National Landscape consider that these impacts will be experienced by the designated landscape for a considerable period during the construction period and likely over a number of years.

Considering REP1-120 Volume 9.47 National Landscape Section 85 Duty Technical Note, the National Landscape consider there may be a divergence of views relating to the ability of the proposed acid grassland restoration and creation to fully meet the requirements of the enhanced section 85 Countryside and Rights of Way Act (2000) that requires relevant authorities to 'seek to further the purpose of a National Landscape' when taking decisions that affect the designated landscape, see also REP1-130 Suffolk County Council Local Impact Report paras 5.46 to 5.58.

This position is recognised in the draft Statement of Common Ground, REP 1A-034 9.42 Draft Statement of Common Ground between National grid Electricity Transmission and the Suffolk & Essex Coast & Heaths National Landscape Partnership that includes the National Landscape's position on this topic following in ref 3.1.1 of that document:

Where the National Landscape Partnership's opinion diverges from the applicant's view relates to its view that the proposal may not be considered to fully mitigate the impacts of the construction phase

The National landscape Partnership note the continuing discussions and negotiations between other Nationally Significant Infrastructure Project proposers and National Landscapes, such as the Norwich to Tilbury Project (Dedham Vale), Lower Thames Crossing (Kent Downs) and North Falls (Suffolk & Essex Coast & Heaths).

For the avoidance of any doubt, the National Landscape Partnership do not consider the potential impacts of the Sea Link proposals to be of the same magnitude as those of the

projects listed above, but is not convinced that the acid grassland restoration and acid grassland creation fully meets the requirements of the enhanced section 85 Countryside and Rights of Way Act (2000).

The National Landscape Partnership would welcome further dialogue and discussion with the scheme proposer on how the area of the National Landscape particularly impacted by the proposals could be further conserved and enhanced, perhaps through a contribution to its Sustainable Development Fund (a grant scheme to enhance the environmental, social and economic elements of the National Landscape), or a ringfenced or focused approach to the impacted area, noting that impacts to part of the National Landscape are considered to be an impact on the National Landscape as a whole.