

Suffolk seascape sensitivity

Comparison of seascape and visual impact assessment methodologies for East Anglia TWO/East Anglia ONE North Offshore wind farms and Five Estuaries windfarm

Final Report

for

Suffolk County Council

Suffolk Coast & Heaths AONB Partnership

East Suffolk Council

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1. Introduction

- 1.1. White Consultants were appointed in April 2023 to carry out a comparison of the seascape, landscape and visual impact assessment (SLVIA) methodologies for East Anglia TWO (EA2) and East Anglia ONE North (EA1N) offshore wind farms and for the current Five Estuaries wind farm (VE). The study was commissioned by Suffolk County Council in consultation with Suffolk Coast & Heaths AONB Partnership and East Suffolk Council.
- 1.2. The study is intended to review if the methods are consistent with a particular focus on the definitions for sensitivity, magnitude of effect and significance of effect but also addressing cumulative effects. The report primarily sets out any differences which may influence findings of the SLVIA. The rest of the PEIR has not been reviewed.
- 1.3. The documents compared are:
 - East Anglia TWO offshore wind farm Environmental Statement Volume 3 Appendix 28.2 SLVIA methodology, October 2019, Version 1.
 - East Anglia ONE North offshore wind farm Environmental Statement Volume 3 Appendix 28.2 SLVIA methodology, October 2019, Version 1.
 - Five Estuaries Offshore wind farm Preliminary Environmental Information Report Volume 6, Annex 10.1: SLVIA methodology, March 2023.
- 1.4. VE wind farm proposes turbines upto 424m to blade tip above Highest Astronomical Tide (HAT). The EA2 method is likely to be based on 300m high turbines above Lowest Astronomical Tide (LAT). There is therefore an inbuilt additional increase in height.
- 1.5. Each section in the VE method is addressed in turn using the same headings. As EA2 and EA1N use the same method, from here onwards only EA2 will be referred to as the comparator to VE.

2. Comparison

Authorship

- 2.1. All documents are prepared by OPEN but the individual authors are not stated in the VE method.

Glossary of terms

- 2.2. VE terms are more comprehensive including sensitivity, likely significant effects, magnitude of change and appear to be based on GLVIA 3¹ definitions. This is fair.
- 2.3. Comparison of main elements of the methods are set out in Table 1 below.

Table 1 Comparison of the main elements of the methods

VE method topic/item reference	East Anglia TWO (EA2)	Five Estuaries (VE)	Comments on VE method
1.2.22 Study areas	50km	60km	Reasonable.
Table 1.1 Data sources	-	Includes reference to White, 2020 report (ie Offshore Energy Strategic Environmental Assessment (OESEA): Review and update of	This is helpful but it depends how it is referred to in the assessment itself (which is not reviewed). The sensitivity of zones may be influenced by the buffers but the feedback

¹ Guidelines for landscape and visual impact assessment, Third Edition, Landscape Institute and IEMA, 2013.

VE method topic/item reference	East Anglia TWO (EA2)	Five Estuaries (VE)	Comments on VE method
		Seascape and Visual Buffer study for Offshore Wind farms, BEIS/Hartley Anderson, 2020.)	on the PEIR from the steering group suggests it is not. The Suffolk sensitivity study is taken into account in respect of the method including criteria and indicators used for sensitivity.
1.5.12 susceptibility	Paragraph 32 onwards Concise	Indicators derived in part from MMO Approach to seascape sensitivity, 2019 and reflected in the Suffolk sensitivity study.	Helpful
1.5.13 value	Paragraph 31 concise	Notes that value of area outside 'immediate setting' of a designation may have lower value. Addition of wildness, remoteness and tranquillity to seascape experience.	May flag potential expectation of lower value away from coast. (PEIR itself has not been reviewed). However, development away from the coast can still have an adverse effect on the designation and environs and associated LCAs/SCAs. See notes on setting below table (2.11 onwards)Reflects MMO, 2019 sensitivity guidance.
Table 1.2 seascape/landscape sensitivity to change	Table A28.2 fairly basic	Reflects MMO, 2019 sensitivity criteria and indicators and reflected in the Suffolk sensitivity study.	Improvement in clarity of criteria and largely fair reproduction/slight rewording.
Table 1.3 magnitude of change seascape/landscape character	Table A28.3 4 categories	6 categories- Has intermediate categories of medium-high and medium-low	Helpful. Also refers to special qualities
1.5.20 Geographical extent	Paragraph 37 basic	Slightly expanded to include special qualities	Appears to be reasonable.
1.5.25 Duration and reversibility	Paragraph 39	Roughly same periods	Fair periods (+10 years long term)
Duration and reversibility	Paragraph 40 keeps size/scale of effect and related significance separate from extent,	Does not have equivalent paragraph	The omission of the paragraph may mean that the assessment will combine all factors together to arrive at magnitude of effect before coming to conclusions on significance. This may

VE method topic/item reference	East Anglia TWO (EA2)	Five Estuaries (VE)	Comments on VE method
	duration, reversibility so clear.		have a reductive effect depending on the weighting of the additional factors. This also may make the assessment less clear depending on whether the judgement on each factor is set out in a table. To be fair, this is how most SLVIAs are structured.
1.5.26 Significant effects	Paragraph 44-onwards	More focussed and mentions designated landscape.	Shorter but clear.
Table 1.8 Evaluation of seascape, landscape and visual effects (ie significance)	Table A28.5	Almost identical. Includes definition of significance categories eg major/major-moderate/moderate.	Fair.
1.6.13 Value of view	Paragraph 50	Largely same	Fair.
1.6.16 Visual susceptibility to change	Paragraph 56	Largely same	Fair.
Table 1.4 Visual sensitivity to change	Table A28.6	Almost same	Fair.
1.6.20 onwards Visual magnitude of change	Paragraph 60	Almost same.	Fair.
Table 1.5 Visual magnitude of change ratings	Table A28.7	More detail in VE and has 6 categories- intermediate categories of medium-high and medium-low	6 categories are helpful. More precise criteria are used but may support/underpin lower levels of assessed magnitude of change. Probably heading towards medium/low at worst and probably low based on definitions.
1.6.25 onwards-geographical extent	Paragraph 61	More detail and precise with measurements eg area and % proportion set out	Potentially may be used to diminish significance of effects. May have been carried out in EA2 assessment anyway though. The use of area/% is misleading as long linear receptors like the coast and related paths and other receptors can appear to be small in area but are very important to the qualities of the AONB

VE method topic/item reference	East Anglia TWO (EA2)	Five Estuaries (VE)	Comments on VE method
			with most visitors concentrated in these areas.
1.6.29 onwards-duration	Paragraph 62	Almost same.	Fair
1.6.31 Significant visual effects	Paragraph 68 onwards	Much more concise	OK- depending on what the findings are ie if the concise definition allows too much flexibility for the assessor to arrive at unreasonable conclusions.
1.7 Night-time effects of lighting Table 1.6	N/A	Visual effects only 4 point scale for magnitude of change.	To be judged on its own merits. Uses evidence to avoid effects on landscape character and therefore on AONB. Suspect statutory authorities would prefer an assessment on the latter because of potential effects on dark skies and tranquillity. The 4 point scale is likely to lead to 'low' assessment which would not be significant.
1.8.4, 1.8.5 Cumulative effects	Paragraph 83 Combined effect of EA2 and EA1N developments taken together but then in addition to other developments.	Only additional effects, not totality. Additional effects include whether adjacent developments are discordant, proliferation, character change.	Similar approach by both. Additional cumulative effects are valid but an assessment of combined effects should also be included. GLVIA 3 para 7.16 talks about stakeholders not drawing <i>artificial distinctions</i> between existing and proposed and being concerned about the totality of effects. It states that usually assessors will go for additional effects only but the scope needs to be agreed at scoping (7.10, 7.11). Nature Scot guidance does talk about combined effects but focusses on additional effects. This is because of the influence of private sector consultants who resist combined effects assessment as it might be problematic with the ongoing intensification of

VE method topic/item reference	East Anglia TWO (EA2)	Five Estuaries (VE)	Comments on VE method
			renewables in some areas. The LI is similarly influenced and has resisted suggestions (made by me) to review and revise the GLVIA3 in this respect.
1.8.6 baseline Table 1.7 Cumulative effects	Table A28.10 Existing developments part of baseline.	Existing and under construction projects part of baseline (even though all are time limited developments)	Means that they are not assessed as part of combined effects, only permitted and proposed in three tiers as in Table 1.7. This makes the cumulative assessment a partial exercise which does not address the key issue of combined effects and does not balance the main seascape and landscape effects assessment which relies on existing development as a factor to reduce perceived effects.
1.8.15/1.8.16 Cumulative effects	Paragraph 87 Talks about potentially significant effects if the addition of EA2/EA1N results in change in character of a seascape to one of a 'seascape with windfarms' ie a key characteristic.	Equivalent discussion under seascape effects in 1.8.15 but it is not clear if this includes existing wind farms or not. It should.	May be same as EA2 but concern anyway.
1.8.18 cumulative effects magnitude of change criteria	Paragraph 90	Virtually the same as EA2. Criteria repeat many in main seascape assessment ie where close to existing developments less likely effect.	Duplication of criteria with main assessment reinforces its likely limited value.
1.8.19 cumulative effects magnitude of change definitions	Paragraphs 91/92	Virtually the same as EA2 ie significant if development becomes a prevailing characteristic.	-
1.8.21 onwards significance	Paragraphs 93/94	Virtually the same as EA2.	-

VE method topic/item reference	East Anglia TWO (EA2)	Five Estuaries (VE)	Comments on VE method
1.10.10 Nature of effects	Paragraph 100	Virtually the same as EA2. ie likely effects are adverse unless otherwise stated.	-
1.10.11 Likelihood of visual effects	Paragraph 107 onwards Weybourne and Shoeburyness data used.	Similar approach- Manston weather data used as closer.	Fair.
Likelihood of visual effects	Paragraph 134 Notes that very good to excellent visibility occurs more in summer season with a higher concentration of visitors.	Not mentioned	Should be noted as it contributes to likelihood of effects commentary.
Effects on purposes of AONB and special qualities	No method	No method.	Suggest that this is needed building on desk study and site visits- see below.

Special qualities/natural beauty indicators

- 2.4. Special qualities reflect what is important about the AONB i.e. they describe its natural beauty and express the qualities for which it was designated and as such should be given great weight (as set out in national planning policy). In the case of Suffolk Coast & Heaths AONB natural beauty indicators are the equivalent of special qualities.
- 2.5. All special qualities are of high value and important whether physical, historical, cultural or perceptual.
- 2.6. Special qualities can be affected not only by development within the AONB but also in the AONB's setting and this in turn can affect the primary statutory purpose.
- 2.7. Whilst special qualities are referred to at various points in the method, there is not a focussed assessment on them. It is recommended that a tabulated assessment of the effects on special qualities is carried out as below.
- Scope each special quality to consider if there are potential effects. For each special quality scoped in:
 - Describe the likely changes caused by development at each phase but concentrating on operational phase.
 - Assess if the nature of effect is beneficial, neutral or adverse and why.
 - Assess duration of effect.
 - Assess if changes are important and if they conserve, enhance or harm the special quality.
- 2.8. The above should be repeated for the *combined* effects of all offshore wind farm developments on the designation.
- 2.9. The assessments should be brought together to assess the effects on the purpose of the AONB as follows:

- Summarise if the effects on any special qualities are important and harmful.
 - Summarise overall significant landscape, seascape and visual effects as they relate to the AONB.
 - Bring together findings to arrive at a judgement on the overall level of harm or otherwise to the purpose of conserving and enhancing the natural beauty of the AONB with a justification.
- 2.10. If the SLVIA assessor does not carry this out then it is suggested that the statutory authorities or their suitably qualified consultants do so to contribute to the decision-making process.

Setting

- 2.11. The VE SVIA method (1.5.13) mentions '*immediate setting*' only in the context of valuing a seascape or landscape receptor higher within or close to a planning designation (ie the AONB). Further away, the value of a landscape/seascape receptor *may* decrease. However, this valued receptor, whether a landscape character area or a seascape character area with its key characteristics, can be affected by views of development outside it. In addition to this, the actual designation itself is a receptor in its own right and development within its setting needs to be considered in conjunction with effects on special qualities.
- 2.12. The wind farm is within the setting of the AONB by virtue of the *size* of the proposed wind turbines, their *moving nature* and their *intervisibility* with the designated coast. The turbines are so large that they project well above the horizon. EN-3 states that where a proposed offshore windfarm is within sight of the coast, there may be adverse effects (2.6.208). Both EN-3 and EN-1 and their consideration of designated landscapes drive the OESEA, 2020 study and thus the Suffolk seascape sensitivity 2020 report which considers the possible effects of offshore windfarms out to EEZ limits. VE lies well within this study's area.
- 2.13. NPPF (176) states in respect of AONBs that:
*'The scale and development within all these designated areas should be limited, while development within their **setting** should be sensitive to locating designed to **avoid** or minimise adverse impacts on the designated areas'* (this report emphasis).
- 2.14. National policy does not therefore mention the '*immediate setting*' as the limit of possible effects on a designated landscape. As such, the term holds no weight in policy.
- 2.15. The Suffolk Coast and Heaths AONB Partnership report '*Development in the setting of the Suffolk Coast & Heaths AONB*' (2015) is helpful in setting out what is considered as the setting locally and how it should be taken into account.