



The Planning Inspectorate
Environmental Services
Central Operations
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Date: 16 August 2021
Your Reference: EN010119-000019
Our Ref: North Falls Scoping Report Response
Enquiries to: Naomi Gould

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NorthFalls@planninginspectorate.gov.uk

Dear Marnie Woods,

Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – Regulation 10.

Application by North Falls Offshore Wind Ltd (the Applicant) for an Order Granting Development Consent for North Falls Offshore Wind Farm.

Response from East Suffolk Council to the Scoping Report submitted to the Secretary of State.

Thank you for the opportunity to comment on the North Falls Offshore Wind Farm Scoping Report dated 16 July 2021. Although this response is from East Suffolk Council the comments have been drafted in consultation with Suffolk County Council who will be sending a separate response.

East Suffolk Council is not a host authority or a direct neighbouring authority of the onshore scoping area. The offshore array areas will however be visible from the Suffolk coastline and designated Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and therefore we wish to provide comments in relation to the Seascape, Landscape and Visual Impacts of the project.

Proposed Methodology

It is noted that further discussion on viewpoints and methodologies between the Applicant, Natural England and local authorities are proposed at paragraph 738. This is a welcome offer, and we look forward to ongoing engagement.

Baseline information

The baseline information set out in the Scoping Report is not comprehensive particularly in relation to the Suffolk Coast and AONB, therefore the following documents are brought to the attention of both the Applicant and Inspectorate.

- Suffolk Seascape Character Assessment <https://suffolklandscape.org.uk/landscape-typology/seascape-typology/>
- Natural Beauty and Special Qualities of the Suffolk Coast and Heaths AONB <https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/sizewell-nuclear-power-station/aonb-special-qualities-document/>
- Designation History Series <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010078/EN010078-004113-SCC%20The%20Designation%20History%20of%20the%20Suffolk%20Coast%20and%20Heaths%20AONB%2020221.pdf>
- Development in the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/ENDORSED-SCH-AONB-Position-Statement-on-Development-in-Setting-of-AONB-2015.pdf>

Viewpoint types required (Ref: GLIVIA 3 paragraph 6.19)

In addition to representative viewpoints, it is expected that *illustrative viewpoints* will also be required as the purpose of Seascape, Landscape and Visual Impact Assessment (SLVIA) is not only to provide technical analysis of the potential impacts but also to ensure the public and Interested Parties have a proper understanding of those likely effects.

Specific Viewpoints may also be required to deal with some locations effectively, such as coastal heritage assets including Landguard Fort and Bawdsey Manor for example, and we would suggest discussions with relevant cultural heritage consultees including Historic England to explore these issues.

Proposed viewpoint selection

Whilst the viewpoints proposed are broadly acceptable it would be appropriate to add to these, with appropriate illustrative and specific viewpoints such as an illustrative viewpoint at the end of Southwold Pier in addition to a representative viewpoint on Gun Hill Southwold for example. Likewise, viewpoints from [Dunwich Coastguard Cottages](#), Sizewell Beach, cliffs above Thorpeness and [Felixstowe seafront gardens](#) are also considered relevant for inclusion. Furthermore, specific viewpoints in relation to both [Bawdsey Manor](#) and [Landguard Fort](#) would also be appropriate given their heritage status, although we defer to Historic England to provide further advice on these matters.

In addition, a representative viewpoint further north at Covehithe should also be considered to understand the potential curtaining effects, and to properly inform consideration of cumulative impacts and their implications for the Suffolk Coast and Heaths AONB.

In addition, we would like to agree:

Approach to viewpoint photography including timing

The Applicant should note that the turbines are likely to be at their most visible in the evening as they will be illuminated by the setting sun in the west, and views will, subject to weather conditions, be widely available from coastal locations both on the shore and from elevated locations back from the beach or cliffs. Therefore, it is requested that baseline photography is taken late in the afternoon where possible, particularly from the most well used resort based public viewpoints, in order to capture these effects.

Assessment of sequential impacts on the Suffolk/England Coast Path

As part of the SLVIA the Applicant should also consider sequential visual effects on users of the Suffolk/England Coast Path. Furthermore, we note that the accumulation of multiple non-significant visual effects along such a route *may* when taken together be of significance. This assessment will also need to consider the cumulative and in-combination sequential visual effects with other projects and proposals.

Representation and assessment of Night-time lighting effects

In the absence of more detailed proposals regarding the mitigation of night-time lighting effects it is suggested that these should be assessed on a reasonable worst-case basis. In addition, the agreed viewpoints should also be photographed at night and likely visual impacts illustrated as has been undertaken for other projects on the Suffolk coast.

Approach to consideration of visibility of the turbines

The seasonality of adverse impacts and the concentration of highest visibility days in certain period of the year, some of which coincide with peak visitor period, should also be a consideration and we refer the Applicant to the following published material, as a guide to carrying out their own research and gathering baseline information.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-001586-6.3.28.8%20EA2%20ES%20Appendix%2028.8%20Offshore%20Windfarm%20Visibility.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-001587->

[6.3.28.9%20EA2%20ES%20Appendix%2028.9%20Met%20Office%20Vessel%20Visibility%20Data%20Study.pdf](#)

Assessment of the of the proposals on the Natural Beauty and Special Qualities of the AONB

In addition to the assessment of landscape and visual effects, the SLVIA will need to include additional analysis of the [Natural Beauty and Special Qualities](#) of the AONB, as these are how the purposes of designation, that is, the objective to “Conserve and Enhance Natural Beauty”, are expressed.

Consideration of potential risks to the S82 purposes of designation of the AONB

Given the size and location of the proposed turbines in relation to the Suffolk Coast and Heaths AONB, it is considered that the Statutory Purposes of the designation may be put at risk by this development, both from its impacts alone and cumulatively with other developments. Therefore, it is considered that the effects of the development on statutory purposes are likely to be a key consideration for Statutory Consultees, Interested Parties, and the Secretary of State. Natural England will be able to provide further guidance on this issue as the advisory body to Government on protected landscapes, and we defer to their expertise in this matter. See <https://www.legislation.gov.uk/ukpga/2000/37/section/82>

Assessment of cumulative landscape and visual effects, including curtaining

Particularly in views from the northwest, it is anticipated that the proposal will contribute both alone and in combination with others to a curtaining of the horizon when viewed from the Suffolk Coast and Heaths AONB. The Applicant will need to carefully consider the extent and significance of these effects, and their implications for both the Natural Beauty of the AONB and the purposes of designation. In this respect we are concerned that the East Anglia One North turbine array is proposed to be scoped out of such an assessment. We propose that it should be scoped back in.

Scoping out of construction impacts

Paragraph 723 seeks to scope out the impacts of construction, however whilst the impacts will not exceed the operation effects in terms of magnitude, they will both extend the duration of these effects and potentially interact with constructing projects both offshore and on the coast, (at Sizewell C for example) generating adverse effects that should be understood and evaluated. In this respect the inclusion of two beach landing facilities during the Sizewell C construction phase strongly indicate that the Sizewell C development should be included in cumulative assessments.

Study Area

We consider that the proposed study area should be extended to 60km radius from the array site to allow for the consideration of turbines of up to 398m in height to blade tip.

Conclusion

East Suffolk Council's comments in relation to the seascape, landscape and visual section of the Scoping Report have been outlined above. It is considered that further work is required to address these matters to ensure that the environmental statement associated with the North Falls Development Consent Order is robust.

Yours sincerely,

Naomi Goold
Principal Energy Projects Officer