



The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 8 – 25 March 2021

**Comments of the Suffolk County Council Landscape Officer**

**1. Post hearing submissions including written submissions of oral case (if required) (ISH10 to 15 & CAH3)**

1.1 Not applicable.

**2. Responses to ExA's Further Written Questions (ExQ3) (if required)**

2.1 Not applicable.

**3. Comments on the Report on the Implications for European Sites (RIES) (if required)**

3.1 Not applicable

**4. Final Statements of Common Ground (SoCG) and Commonality requested by the ExA under Procedural Decision 15 (Annex F) also listing matters not agreed (in circumstances where a SoCG could not be finalised).**

4.1 Statement of Common Ground with East Suffolk Council and Suffolk County Council to be submitted by the Applicant at Deadline 8.

**5. Comments on any additional information/submissions received by Deadline 7**

5.1 Not applicable.

**6. Responses to any further information requested by the ExAs for this deadline**

ISH8 AP2 Applicant's *Think Piece* – Appendix 3 of REP6-049

6.1 The Applicants have identified significant adverse impacts on the coastline of the Area of Outstanding Natural Beauty (AONB) and there remains a dispute between the Applicants and Natural England as to the nature and extent of those significant impacts on the character and special qualities of the Suffolk Coast and Heaths AONB. SCC has had early sight of and endorses Natural England's position on this matter that will be submitted at Deadline 8.

6.2 SCC considers that, whilst the Think Piece provides some useful background information on other projects and proposals that have impacted, to a greater or lesser degree, on protected landscapes, meaningful comparison is rendered problematic at best by the following issues:

- The differences in character of the respective areas
- The nature of the receiving environment

- The significance and sensitivity of the coast as a component of the designation
- The relationship between the turbines and the viewer
- The seasonal visibility of the proposed developments and consequent thresholds of sensitivity on the Suffolk coastline see Suffolk Seascape Sensitivity to offshore wind farms October 2020 - White Associates (Appendix B of Suffolk Seascape Sensitivity to offshore Wind Farms <http://suffolklandscape.org.uk/wp-content/uploads/2020/10/Suffolk-seascape-sensitivity-to-wind-farms-final-061020.pdf>)

6.3 Therefore, whilst SCC again defers to the views of Natural England on this Think Piece, we would like to draw the Examination's attention to the following issues.

- 1) In Table 1 the applicant states, under 'Geographical Relationship with Designated Landscape', that both the Rampion array and EA2 project are orientated 'parallel to the coast'. Notwithstanding this apparent common thread, it should be noted that:
  - a) The coastline of the South Downs National Park (SDNP) is only about 18 Km long and is not directly offshore at the key coastal viewpoint of Beachy Head, whilst the SC&H AONB has a coastline of over 70km with EA2 directly offshore for a notable length of its designated coastline. As a result of having a significantly greater length of designated coastline, the coastal nature of the Suffolk designation and its relationship to the sea is integral to its character and special qualities, in a way that is not the case for the SDNP.
  - b) Furthermore, the majority of the SDNP is in fact separated from the coast by an undesignated and well-developed coastal strip, whereas the Suffolk Coast and Heath AONB has a direct relationship with its coastal strip and adjacent seas, and the limited built environment of the Suffolk Coast and Heaths is incorporated into the designated area, and in fact contributes to the character and special qualities and cultural associations of the designation and the Suffolk Coast in general. These issues are discussed in detail in the local Seascape Typology available at <https://suffolklandscape.org.uk/landscape-typology/seascape-typology/> and we draw the Examination's attention to this study, which has been previously provided to the Applicants and was developed, following discussion with the Applicants, regarding the lack of local seascape characterisation material.  
(s6.1 Cultural Associations in Seascape Character Assessment: Suffolk South Norfolk and North Essex December 2018 [https://suffolklandscape.org.uk/wp-content/uploads/2020/08/Part1\\_5997\\_Assessment\\_V1\\_10\\_Issue\\_web.pdf](https://suffolklandscape.org.uk/wp-content/uploads/2020/08/Part1_5997_Assessment_V1_10_Issue_web.pdf))

2) Paragraph 11 states that National Parks have a higher level of protection than Areas of Outstanding Natural Beauty.

- Paragraph 5.9.9 EN-1 states that 'National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty'. At no point does this or any other paragraph in National Planning Policy state that this status is higher in National Parks than it is in AONBs.
- The level of protection for National Parks and AONBs is the same as both National Planning Policy and primary legislation make clear. The primary statutory purpose of both National Parks and AONBs is the 'conserving and enhancing of natural beauty'. They are equivalent to National Parks in terms of their landscape quality, scenic beauty, and their planning status.