

East Anglia TWO Offshore Windfarm

Appendix 28.1 Seascape, Landscape and Visual Impact Assessment Consultation Responses

Environmental Statement Volume 3

Applicant: East Anglia TWO Limited
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Appendix 28.1 is supported by the tables listed below.

Table Number	Title
Table A28.1	SLVIA Consultation Responses

Glossary of Acronyms

AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
CMOS	Complementary Metal Oxide Semiconductor
DTM	Digital Terrain Model
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
GIS	Geographic Information Systems
GLVIA	Guidelines for Visual Impact Assessment
km	Kilometres
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LVIA	Landscape Visual Impact Assessment
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MW	Megawatt
NCA	National Character Area
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OS	Ordnance Survey
PEIR	Preliminary Environmental Information Report
RPG	Registered Park and Garden
SCT	Seascape Character Type
SL&V	Seascape, Landscape and Visual
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNH	Scottish Natural Heritage
ZTV	Zone of Theoretical Visibility

Glossary of Terminology

Applicant	East Anglia TWO Limited.
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one offshore construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach to the EIA and the information required to support HRA.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Landscape character	A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
Landscape effects	Effects on the landscape as a resource in its own right.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition
Monitoring buoys	Buoys to monitor in situ condition within the windfarm, for example wave and metocean conditions.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.

Offshore development area	The East Anglia TWO windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.
Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the offshore construction, operation and maintenance platform and the offshore electrical platforms.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Seascape	Landscapes with views of the coast or seas, and coasts and adjacent marine environments with cultural, historical and archaeological links with each other.
Visual amenity	The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating or travelling through an area.
Visual effects	Effects on specific views and on the general visual amenity experienced by people.

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28.1 SLVIA Consultation Responses

28.1 Introduction

1. This appendix to **Chapter 28 Seascape, Landscape and Visual Impact Assessment** covers those statutory consultation responses that have been received as a response to the Scoping Report (2017), the Preliminary Environmental Information Report (PEIR) (2018) and Expert Topic Group (ETG) Meetings.
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A28.1**.
3. As Section 42 consultation for the proposed East Anglia TWO project was conducted in parallel with the proposed East Anglia ONE North project, where appropriate, stakeholder comments which were specific to East Anglia ONE North, but may be of relevance East Anglia TWO, have also been included in the consultation responses for East Anglia TWO.

Table A28.1 Consultation Responses Related to Chapter 28 SLVIA

Consultee	Date/ Document	Comment	Response / where addressed in the ES
The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR.			
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate agrees that an assessment of impacts beyond the ZTV can be scoped out of the assessment.	Noted. Addressed in section 28.3.1 of this chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate agrees that as a result of the geographical location of the National Park from the Proposed Development, impacts to this area are unlikely to be significant and can be scoped out.	Noted. Addressed in section 28.7.1 of this chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate agrees that as a result of the geographical location of the Landscape Character Areas within Broadland and South Norfolk Districts from the Proposed Development, impacts to these areas are unlikely to be significant and can be scoped out.	Noted. Addressed in section 28.7.1 of this chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate agrees that as a result of the geographical location of East Anglia ONE, East Anglia THREE, Norfolk Vanguard and Norfolk Boreas offshore windfarms in relation to the proposed development, the matter of cumulative impacts with these offshore windfarms can be scoped out.	Noted. Addressed in section 28.9 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	The Environmental Statement should include details of the approach to visualisations, including the representation of aviation and marine navigation lighting.	Approach to visualisation of aviation and marine navigational lighting detailed in section 28.3.2.5 of this chapter. Night-time photomontages are provided in Figures 28.25f-g, 28.26f-g, 28.28g-h and 28.37f-g .
Suffolk County Council / Suffolk Coastal and	02/12/2017	Definitions of duration of landscape and visual effects should be provided.	Methodology is described in Appendix 28.2 .

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
Waveney District Councils	Scoping Response		
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	Sequential visual effects on users of the Suffolk Coast Path should be assessed, given the relationship of this route to the designated (AONB) landscape and the likely duration of impacts.	Methodology described in Appendix 28.2 . Assessment undertaken in section 28.8.2 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	The following are essential: A realistic worst case scenario to be used; A clear definition of the range of susceptibility of seascape and landscape types. Coast path users to be accorded the highest level of sensitivity An ongoing series of less than moderate effects on coast path walkers can still be significant due to the continuous experience. Thresholds of significance need to be agreed as part of the methodology prior to submission of the ES.	Realistic worst case scenario described in section 28.8.2 of this chapter. Definition of susceptibility described in Appendix 28.2 . Sensitivity of coast path users assessed in Appendix 28.6 . Effects on coast path users assessed in Appendix 28.6 . Thresholds of significance described in Appendix 28.2 .
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	The effects of the proposals on seascape character will be evaluated using the seascape character assessment.	Effects on seascape character assessed in Appendix 28.3 and summarised in section 28.6 of this chapter.
Suffolk County Council / Suffolk Coastal and	02/12/2017 Scoping Response	The SLVIA should assess the contribution of the seascape to the character of all the receiving landscape/s and on that basis the likely impacts of the proposal.	Effects on landscape character assessed in Appendix 28.4 and summarised in section 28.7 of this chapter.

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
Waveney District Councils			
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	A full understanding and assessment of the proposed development on the Suffolk Coast and Heaths AONB Special Qualities Document is necessary to meet the requirements of EN3 (2.6.203), where assessment is required of people's perception and interaction with the seascape. The SLVIA will need to systematically assess the impacts of the proposal on the character and special qualities of the AONB.	Effects on special qualities of the AONB assessed in Appendix 28.4 and summarised in section 28.7 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	The ES needs to assess the potential impact of the proposed development on the setting of the AONB as well as the AONB itself, as explained further in Position Statement: Setting of the Suffolk Coast & Heaths AONB.	Effects on setting of the AONB assessed in Appendix 28.4 and summarised in section 28.7 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	Full assessment of combined onshore and offshore effects is critical where combined effects are experienced, either simultaneously or in near immediate sequence. Combined landscape and visual effects between offshore and onshore project components are likely to occur and the agreed methodology should allow evaluation of these combined effects.	Combined onshore and offshore effects are assessed in section 28.11 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	Future projects include the Nautilus interconnector. The applicant should not exclude the project from the CIA at this stage.	Future projects are detailed in Table 28.5 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	The applicant should be mindful of the definition of seascape as set out in NPS EN3: <i>'Where necessary, assessment of the seascape should include an assessment of three principal considerations on the likely effect of offshore windfarms on the coast:</i>	Effects on seascape character assessed in Appendix 28.3 and summarised in section 28.5 of this chapter.

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p><i>Limit of visual perception from the coast.</i></p> <p><i>Individual characteristics of the coast which affect its capacity to absorb a development; and</i></p> <p><i>How people perceive and interact with the seascape’.</i></p>	
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	The agreed approach to viewpoint selection and timing of baseline photography is an attempt by all parties to properly evaluate the impacts.	Viewpoint assessment from agreed viewpoints undertaken in Appendix 28.5 and summarised in section 28.8 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	Given the unprecedented size of the proposed turbines, it is difficult to make reasonable assumptions regarding lighting. It will also be necessary to understand how the visibility of aviation and navigation lighting will vary depending on conditions.	Proposed lighting of the turbines described in section 28.3.2.5 of this chapter, assessed in the visual assessment in Appendix 28.5 and summarised in section 28.8 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	Visibility data for the Suffolk coastline does not appear to be available. Has yet to be established if the proposed use of Weybourne and Shoeburyness data is a reasonable proxy for the Suffolk and south Norfolk coastline.	Appraisal of visibility data and its influence on the likelihood of visual effects is described in Appendix 28.5 and summarised in section 28.8 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	02/12/2017 Scoping Response	It is important to be clear as to where and to what extent offshore windfarms form a characteristic element in different parts of the study area. It is likely that the magnitude of change and sensitivity of receptors will vary in different locations.	Assessed in Appendix 28.3 and Appendix 28.4 and summarised in section 28.6 of this chapter and section 28.7 of this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Norfolk County Council	November 2017 Scoping Response	For both offshore and onshore development, the EIA/PEIR will need to provide: an assessment of the impact of the development on the landscape and seascape character.	Impacts on landscape character assessed in Appendix 28.4 and summarised in section 28.7 of this chapter. Seascape character assessed in Appendix 28.3 and summarised in section 28.8 of this chapter.
Norfolk County Council	November 2017 Scoping Response	An assessment of the visual impact which should include a ZTV and photomontages illustrating the impact of the development.	Visual effects assessed in Appendix 28.5 and summarised in section 28.8 of this chapter. ZTVs provided in Figures 28.4 - 28.8 . Photomontages provided in Figures 28.25 – 28.54 .
Norfolk County Council	November 2017 Scoping Response	An assessment of the cumulative effect together with other (a) operational windfarms (b) permitted windfarms and (c) development proposals like to come forward.	Cumulative effects assessed in Appendix 28.7 and summarised in section 28.9 of this chapter.
Norfolk County Council	November 2017 Scoping Response	An assessment of the impact of the development on the heritage landscape.	Effects of the proposed East Anglia TWO project on cultural heritage is assessed in Chapter 16 Marine Archaeology and Cultural Heritage and Chapter 24 Archaeology and Cultural Heritage .
Natural England	08/12/2017	It is important to highlight the much larger scale and geographic spread of Round 3 compared to Rounds 1 and 2 of development. There is potential for	Cumulative effects assessed in Appendix 28.7 and

Consultee	Date/ Document	Comment	Response / where addressed in the ES
	Scoping Response	a different range and/or greater level of impacts to arise from Round 3 development, particularly in relation to cumulative impacts.	summarised in section 28.9 of this chapter.
Natural England	08/12/2017 Scoping Response	Welcomes further information pertaining to the specific survey methodologies to be adopted for assessment of impacts and for a preliminary assessment of key potential impacts associated with the development.	SLVIA Methodology described in Appendix 28.2 . Assessments of seascape, landscape and visual effects provided in Appendix 28.3, 28.4 and 28.5 and summarised in section 28.6, 28.7 and 28.8 of this chapter.
Natural England	08/12/2017 Scoping Response	The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development and reference to the relevant National Character Areas.	Effects on landscape character assessed in Appendix 28.4 , summarised in section 28.7 of this chapter and shown in Figure 28.12 and 28.17a-g .
Natural England	08/12/2017 Scoping Response	The EIA should include assessments of visual effects on the surrounding area.	Visual effects assessed in Appendix 28.5 and summarised in section 28.8 of this chapter.
Natural England	08/12/2017 Scoping Response	Natural England supports the use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment (GLVIA 3).	Noted. Methodology outlined in Appendix 28.2 .
Natural England	08/12/2017 Scoping Response	Seascape, landscape and visual effects as a result of the East Anglia TWO offshore windfarm can be scoped out beyond 50km.	Noted. Addressed in section 28.3.1 of this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Natural England	08/12/2017 Scoping Response	The seascape character assessment for the waters off the Suffolk and Norfolk coastlines within the study currently being prepared by Suffolk County Council can inform the baseline seascape characterisation in the SLVIA.	Effects on seascape character assessed in Appendix 28.3 and summarised in section 28.6 of this chapter.
Natural England	08/12/2017 Scoping Response	The SLVIA should assess the impacts of the proposed East Anglia TWO offshore windfarm on the special characteristics of the Suffolk Coast and Heaths AONB and the Suffolk Heritage Coast. Consideration should be given to the direct and indirect effect upon this designated landscape, in particular the effect upon its purpose for designation.	Effects on designated landscapes are addressed in Appendix 28.4 and summarised in section 28.7 of this chapter.
Natural England	08/12/2017 Scoping Response	Advice from the Broads Authority should be sought in terms of whether this protected landscape can be scoped out of the assessment.	Effects on landscape character assessed in Appendix 28.5 and summarised in section 28.7 of this chapter.
Natural England	08/12/2017 Scoping Response	The SLVIA should include the cumulative effect of the development with other relevant existing or proposed development in the area. Agreed that the focus of the cumulative SLVIA will be on the additional impact of the proposed East Anglia TWO offshore windfarm in conjunction with other developments of the same type i.e. other offshore windfarms i.e. Scroby Sands, Greater Gabbard, Galloper and East Anglia ONE North offshore windfarm.	Cumulative effects assessed in Appendix 28.7 and summarised in section 28.9 of this chapter.
Expert Topic Group	26/04/2017 Expert Topic Group meeting	Worst case scenario for the visual impacts was presented as turbines of a maximum tip height of 300 meters.	Worst case scenario outlined in section 28.3.2 of this chapter.
Expert Topic Group	26/04/2017 Expert Topic Group meeting	It was recommended that a full set of visualisations in summer (July/August) in full visibility conditions were included, to represent maximum visibility scenario, which is likely to be when sun in the west (evening) (when sun would be lighting front of turbines). A selection of viewpoints could then be used to illustrate different times of day e.g. morning photos to show the context of the less visible part of the day (when sun is behind the turbines).	Photomontage visualisations shown in Figures 28.25 – 28.54 .

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Expert Topic Group	26/04/2017 Expert Topic Group meeting	It was recommended that additional Met Office visibility data should be used to corroborate the data from Weybourne weather station. Met Office visibility data could be used to assess the seasonal timing and duration of 'excellent' and 'good' visibility, which will be key to determining impact significance.	Visual effects assessed in Appendix 28.5 and summarised in section 28.8 of this chapter.
Expert Topic Group	26/04/2017 Expert Topic Group meeting	Viewpoints selected for assessment should not be restricted to beach views. Land often rises up from the beach, affording more visibility.	Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter.
Expert Topic Group	26/04/2017 Expert Topic Group meeting	At time of the ETG meeting, there was no published baseline Seascape Character Assessment available for this coastline. SLVIA needs to consider how the baseline is defined to inform assessment work. SPR may need to commission a baseline seascape characterisation study.	SLVIA uses the Suffolk, South Norfolk and North Essex Seascape Character Assessment as the baseline, as described in Appendix 28.3 and summarised in section 28.6 of this chapter.
Expert Topic Group	26/04/2017 Expert Topic Group meeting	LVIA should consider how the proposed development will affect the special qualities of the AONB e.g. the sea constitutes the setting to the AONB. AONB special qualities document should be referred to when defining special qualities.	Effects on seascape character assessed in Appendix 28.3 and summarised in section 28.6 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	18/05/2017 Viewpoints and LVIA advice note	<p>1) A full suite of viewpoints as far south as Felixstowe and as far north as Caister on Sea will be appropriate.</p> <p>2) Viewpoint selection should identify both beach locations and elevated locations above the strand line, such as Southwold Common, Gun Hill Southwold and Dunwich Coastguard Cottages.</p> <p>3) At each principal location, such as Lowestoft, Kessingland, Southwold Walberswick, Thorpeness, Dunwich, Bawdsey and Felixstowe/ Old Felixstowe there should be both representative and illustrative viewpoints to identify how each settlement will be affected by the proposals.</p>	<p>Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter.</p> <p>Photomontage visualisations shown in Figures 28.25 – 28.54 include late afternoon, evening and dusk views.</p> <p>SLVIA uses the Suffolk, South Norfolk and North Essex Seascape Character Assessment as the baseline,</p>

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p>4) In consultation with Historic England and other heritage consultees it is possible that specific viewpoint locations relating to scheduled monuments and listed buildings or parklands will be required.</p> <p>5) Suggested that specific locations are provided with additional late afternoon views to capture the effect of side lighting of the turbines from the west and a suite of dusk views to illustrate the likely impacts of aviation and marine safety lighting.</p> <p>6) In order to evaluate the landscape and visual impacts of the proposal, a seascape baseline will need to be developed and agreed. The contribution of this seascape baseline to the character and special qualities of the AONB and Heritage Coast and its setting, also need to be agreed.</p>	as described in Appendix 28.3 and summarised in section 28.6 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	04/07/2017 Response on notes of East Anglia TWO and East Anglia ONE North meetings 26 th and 27 th April 2017	Lighting of the turbines is likely to be a sensitive issue, given the size of the turbines it would be helpful to establish the likely illumination requirements from the Civil Aviation Authority (CAA) and Ministry of Defence (MOD).	Turbine lighting proposals described in section 28.3.2 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	04/07/2017 Response on notes of East Anglia TWO and East Anglia ONE North meetings 26 th and 27 th April 2017	The degree of visual perception of the array from the coast is a particularly important matter that is identified in EN3 at paragraph 2.6.203. The applicant should be able to demonstrate that Weybourne is a satisfactory analogy for the Suffolk coastline and confirm if there is other data available from the Met Office Data Archive, (MIDAS), Trinity House, Maritime and Coastguard Agency (MCA) or other sources that would help to corroborate this data.	Visual effects assessed in Appendix 28.5 and summarised in section 28.8 of this chapter.

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Suffolk County Council / Suffolk Coastal and Waveney District Councils	04/07/2017 Response on notes of East Anglia TWO and East Anglia ONE North meetings 26 th and 27 th April 2017	The characteristics of the coast and its sensitivities and ability to absorb the impacts of the proposal are a particularly important matter that is identified in EN3 at paragraph 2.6.203. The applicant will need to review the current seascape baseline and present possible options for assessing the impact of the proposal on the waters between the array and the shoreline of Suffolk (and Norfolk).	SLVIA uses the Suffolk, South Norfolk and North Essex Seascape Character Assessment as the baseline, as described in Appendix 28.3 and summarised in section 28.6 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	04/07/2017 Response on notes of East Anglia TWO and East Anglia ONE North meetings 26 th and 27 th April 2017	The applicant will present draft locations for viewpoints and those viewpoints that will be used for verified visualisations and if required, illustrative visualisations; to be agreed with the landscape and visual group in discussion and through joint site visits.	Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter. Photomontage visualisations shown in Figures 28.25 – 28.54 .
Suffolk County Council / Suffolk Coastal and Waveney District Councils	04/07/2017 Response on notes of East Anglia TWO and East Anglia ONE North meetings 26 th and 27 th April 2017	Viewpoint locations should be sufficiently widespread to pick up any in combination visual effects with turbines that are part of the visual baseline, such as Gabbard / Galloper, Scroby Sands, Gunfleet Sands and the London Array.	Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter.
Suffolk County Council / Suffolk Coastal and	04/07/2017	Visualisations will include night-time views and where appropriate may include combined views with consented but unbuilt arrays. It is also likely to be necessary to consider the possible interaction of this proposal with the	Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter.

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Waveney District Councils	Response on notes of East Anglia TWO and East Anglia ONE North meetings 26 th and 27 th April 2017	construction and operational phases of Sizewell C (SZC) for which specific visualisations may be required.	Photomontage visualisations shown in Figures 28.25 – 28.54 include late afternoon, evening and dusk views. Cumulative effects assessed in Appendix 28.7 and summarised in section 28.9 of this chapter.
Expert Topic Group	07/07/2017 Project Update and Seascape Visuals Meeting	Visibility data from Weybourne and Shoeburyness will be combined to give more robust data for the visibility assessment.	Visual effects assessed in Appendix 28.5 and summarised in section 28.8 of this chapter.
Expert Topic Group	07/07/2017 Project Update and Seascape Visuals Meeting	Partial agreement that the proposed coastal viewpoints were broadly suitable at a high level, but that the range of viewpoints was insufficient to complete a thorough assessment at the most sensitive receptors. More viewpoints will be considered, particularly in areas where detailed assessment is needed, as well as more elevated viewpoints. In addition, more at elevated coastal cliff top views will also be considered.	Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	27/07/2017 Further comments on viewpoint selection	List of 22 representative viewpoints, which were issued to the ETG subsequent to 7 th July ETG meeting, was confirmed as being a satisfactory initial set, but a night time-morning view is also required in the Felixstowe area, to capture the interaction with existing baseline lighting from Galloper, Gabbard, London Array, and the ports/ shipping traffic. Additional representative viewpoints were requested: Landguard Common (EA2) public open space and Landguard Fort Ancient Monument etc. (EA2) Cliff top Hamilton Gardens or Wolsey Gardens Felixstowe (EA1N EA2) Orford Ness eastern shore; at the pagodas (EA1N and EA2)	Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter.

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		<p>Roof of Orford Castle (EA1N and 2) – given the public access and status of the site and our experience with Historic England over Leiston Abbey and SzC.</p> <p>Lowestoft Sea front Gardens (EA1N and EA2)</p> <p>Additional illustrative viewpoints also suggested:</p> <p>Southwold - end of the pier (EA1N/2)</p> <p>Pulhamite cliffs at Bawdsey Manor (EA2)</p> <p>Ness Point Lowestoft (EA1N/2)</p> <p>Corton Holiday Village (EA1N/2)</p>	
Suffolk County Council / Suffolk Coastal and Waveney District Councils	27/07/2017 Further comments on viewpoint selection	<p>Definitions of representative and illustrative viewpoints agreed</p> <p>Representative viewpoints – These are selected to represent the experience of different types of visual receptor where larger numbers of viewpoints cannot all be included; full visualisation with analysis of impacts in the text.</p> <p>Illustrative viewpoints – These are chosen specifically to demonstrate a particular effect or specific issues; appropriate visualisation for the location but written analysis of the impacts not required for LVIA. (Note however that analysis of heritage impacts may be required in heritage assessment).</p>	Agreed viewpoints for visual assessment listed in Table 28.6 of this chapter.
Suffolk County Council / Suffolk Coastal and Waveney District Councils	27/07/2017 Further comments on viewpoint selection	Request for a systematic agreed approach to the assessment of visual impacts on users of the existing / in development coast path. May be appropriate to assess the impacts on those walking north and those walking south separately; and/or to divide the route into sections and the degree of impact assessed for each section. As well as assessing the visibility of the	Visual effects on users of the coastal path assessed in Appendix 28.6 and summarised in section 28.8 of this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		proposal from the route, it is suggested that the contribution of the open sea to the character and visual amenity should also be evaluated.	
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	The format of the Onshore LVIA and Offshore SLVIA should be considered, with the potential for merging of the two topics to address the overlap of onshore and offshore landscape and visual effects.	Offshore SLVIA is contained in Appendices 28.2 – 28.7 . Onshore LVIA is contained in Chapter 29 Landscape and Visual Impact Assessment . Inter-related effects of both offshore and onshore elements are assessed in section 28.11 of this chapter.
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	Consultees requested clear documentation that explains what is to be assessed under each 'scenario' and for each application (EA1N and EA2).	Scenarios for the impact assessment contained in this SLVIA are explained in section 28.4 of this chapter.
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	Confirmed list of projects for cumulative assessment to be circulated to all ETG stakeholders. Requested that Greater Gabbard and Galloper windfarms are included in the SLVIA baseline. The stage two SZC consultation should inform the basis for the development of a worst case scenario to deal with these cumulative impacts of the construction and operation of Sizewell C.	Agreed list of cumulative projects for assessment in the SLVIA in Table 28.6 of this chapter.
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	Agreement that for SLVIA the newly developed 'Suffolk, South Norfolk and North Essex Seascape Character Assessment' will form the baseline.	SLVIA uses the Suffolk, South Norfolk and North Essex Seascape Character Assessment as the baseline, as described in Appendix 28.3 and summarised in section 28.6 of this chapter.

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Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	Suffolk County Council requested consideration of two worst case scenarios in the SLVIA (more and smaller turbines OR fewer and taller turbines). Natural England felt that only assessing the tallest turbines would be sufficient but would recommend the SLVIA clearly explains the worst case scenario assumptions used in the assessment.	Worst case scenario for the SLVIA described in section 28.3.2 of this chapter.
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	Clarification required if lighting for night-time OSPs will be visible above the horizon. Realistic worst case scenario for SLVIA will clarify assumed position of the offshore platforms in the array area (i.e. closest to shore) and if OSP lighting will be visible.	Lighting proposals described in worst case scenario for the SLVIA in section 28.3.2 of this chapter. Assessment of visual effect of lighting assessed in Appendix 28.5 and summarised in section 28.8 of this chapter.
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	ETG requested that photographs taken for evening visualisations for SLVIA are taken post 3pm.	Photomontage visualisations shown in Figures 28.25 – 28.54 include late afternoon, evening and dusk views.
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	Following review of the Method Statement provided to stakeholders in advance of the meeting and then discussed at the SLVIA ETG, a 50km radius study area was agreed for the SLVIA.	Noted. Addressed in section 28.3.1 of this chapter.
Expert Topic Group	27/04/2018 LVIA / SLVIA ETG Meeting	Agreed that definitions of duration (short, medium & long-term) should match those agreed in East Anglia ONE and East Anglia THREE projects.	Noted. Addressed in section 28.4 of this chapter and Appendix 28.2 .
Suffolk County Council / Suffolk Coastal and Waveney District Councils	Response to meeting of 27 th April 2018	In respect of the information provided regarding the timing of photography undertaken, the Suffolk Local Authorities suggest that the priority of evening summer photography (6pm-8pm) are viewpoints 3, 4, 5, 6, 7, 8, If at all possible viewpoints 9, 10 11 should also be included.	Photomontage visualisations shown in Figures 28.25 – 28.54 include evening views from viewpoints 3, 4, 5, 6, 7 and 8.

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The following comments were made in response to the PEIR and were taken into account in the production of the ES			
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The AONB Partnership has significant concerns about the impact of the offshore developments will have on the nationally designated landscape.	Embedded mitigation measures in the form of a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. Visualisations showing this mitigation (the difference between the East Anglia TWO offshore windfarm site, PEIR and ES) are presented in Figures 28.55a – 28.60b .
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	This concern is particularly acute relating to the character of the AONB, its long distance and panoramic views, the introduction of human activity at an industrial scale, the reduction in features associated with tranquillity and seascape character.	Embedded mitigation measures in the form of a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. Visualisations showing this mitigation (the difference between the East Anglia TWO offshore windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The AONB Partnership considers that to conform to EN1 that the proposed developments should not significantly negatively impact nationally designated landscape.	Effects on AONB assessed in sections 28.6, 28.7 and 28.8 of this chapter and Appendix 28.4 . NPS Assessment Requirements detailed in Table 28.3 .

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Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The AONB Partnership considers that to conform to EN3 that the proposed developments should not have significantly negatively impact nationally designated landscape. Where there are significant adverse impacts these should be outweighed by environmental, social and economic benefits	Effects on AONB assessed in sections 28.6, 28.7 and 28.8 of this chapter and Appendix 28.4 . NPS Assessment Requirements detailed in Table 28.3 . The benefits of the proposed East Anglia TWO project, in particular, the contribution to meeting national energy targets are discussed in Chapter 2 Need for the Project .
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The statutory Suffolk Coast & Heaths AONB Management Plan 2018-23 outlines within its 25 year vision for the area that: Nationally Significant Infrastructure Projects such as energy production and its associated infrastructure should seek to avoid damage to the natural beauty of the AONB and where this cannot be achieved it should seek to minimise, mitigate and compensate for any residual damage. The AONB Partnership considers that the ScottishPower Renewables proposals for development require the proposals to meet the aims of the statutory AONB Management Plan.	The conclusions of the SLVIA in section 28.13 of this chapter address conformity with AONB management plan.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The AONB Partnership notes that the concluding paragraph of the Preliminary Environmental Information Report chapter states that EA1N will have some significant seascape, landscape and visual effects.	No significant effects of the construction and operation of the offshore infrastructure are identified for the proposed East Anglia ONE North project. Significant landscape and visual effects result from the construction of the onshore infrastructure. These occur only from localised areas in

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			close proximity to the onshore infrastructure and are of short-term and temporary duration.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The AONB Partnership also notes that the concluding paragraph of the Preliminary Environmental Information Report chapter states that EA2 will have significant seascape, landscape and visual effects on the character of some inshore seascape and coastal edge landscape at the local and regional scale.	Effects on inshore seascape and coastal edge landscape assessed in sections 28.6, 28.7 and 28.8 of this chapter and Appendix 28.3 (Seascape) and Appendix 28.4 (Landscape).
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The AONB Partnership consider the in combination impacts of EA1N and EA2 with existing and proposed major infrastructure associated with the Suffolk Coast have not been adequately assessed. The AONB Partnership considers that the in combination impacts of the proposals with existing developments such as Sizewell A, Sizewell B, the proposed Sizewell C, the proposed interconnectors (Nautilus and EuroLink) and wind energy infrastructure of Galloper and Gabbard have not been fully acknowledged or assessed.	Cumulative Effects with the Sizewell C Project are now included. These are assessed in Appendix 28.7 and summarised in section 28.9 of this chapter. Sizewell A and B, Galloper and Gabbard substations form part of the baseline. It was agreed with the ETG that there is insufficient information to assess NG Ventures (Nautilus & Eurolink). This is in line with Planning Inspectorate Advice Note 17 Cumulative Effects Assessment.
Suffolk Coast and Heath AONB Partnership	25/03/2019	It is noted that none of the drawings show the entire AONB. A plan showing the full extent of the AONB would help to highlight the extent to which the AONB is a coastal AONB, the extent to which it lies within 50km of the proposed developments and its narrowness. Given the importance of the	Full extent of the AONB is shown in Figure 28.3 and the extent to which it lies within the 50km study area. Figure 28.18

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	Section 42 Consultation Response	Suffolk Coast & Heaths AONB, the boundary of the designation should be shown on landscape character, Zone of Theoretical Visibility (ZTV), including cumulative ZTVs, and viewpoint maps to enable the reader to identify those landscape areas and viewpoints, which are relevant to the AONB.	shows the AONB on the ZTV. Figure 28.21d shows it cumulatively with East Anglia ONE North. AONB shown in viewpoint location map Figures 28.25-28.54 .
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Whilst it is recognised that viewpoints have been selected through consultation with key parties, there are a number of Landscape Character Types (LCTs) where landscape effects are identified but no representative viewpoint is provided. Viewpoints for example from North Warren (LCT 7d) or from river flood defence embankments adjacent to the River Ore (LCT 6e) would be informative.	Representative and illustrative viewpoints were selected and agreed in consultation with ETG, covering regular and representative locations along the AONB coastline. There are two viewpoints within 2km of North Warren at Aldeburgh and Thorpeness (Viewpoint 12 & 13). Although further viewpoints are not required to form a judgement on the likely significant effects of the proposed East Anglia TWO and East Anglia ONE North projects), illustrative wireline viewpoints have been provided from North Warren (Figure 28.54) and River Ore (Figure 28.55).
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Figure 28.17 illustrates the landscape character types and their local subdivision. However not all the local areas are clearly marked on this plan (e.g. 7c and 6e are missing) making cross reference with the assessment tables for landscape impacts difficult. Furthermore LCT 8 is marked as a, b, c on the plan but referred to as 1, 2 and 3 in the report.	Noted. Corrected in landscape character types shown in Figure 28.17a-g .

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Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Figure 28.25 for EA2 is a useful drawing as it summaries the significant effects of the scheme on the coastal landscapes. However, LCT 7a is considered to experience significant effects, of which Easton Barents is a part, and yet this latter area is not shaded in on this plan. Furthermore, the colours used are misleading as the significant effects on seascape are shown as a yellow hatch not pink/red, the yellow hatch being similar in colour to the AONB designation	Noted. All figures have been reproduced for the Environmental Statement.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	On the ZTV drawings the categories for number of turbines visible is not the same for EA1N and EA2 making comparison between each scheme more difficult	The proposed East Anglia TWO and East Anglia ONE North projects have a different number of wind turbines (up to 75 and 67 respectively), so the PEIR categories reflected this difference. Figures 28.5, 28.6, 28.7, 28.15 – 28.19 have been updated to show consistent number of turbines in each ZTV category for each project (e.g. 1-10, 11-20, 21-30 wind turbines etc).
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The figures showing cumulative effects of EA1N and EA2 should show the turbine layouts of both schemes.	The wind turbine layouts for both the proposed East Anglia TWO project and proposed East Anglia ONE North project are shown in Figure 28.21d and Figures 28.25-28.54 .
Suffolk Coast and Heath	25/03/2019	Para 139 of Chapter 28 for EA2 states that existing windfarms in the coastal waters off Suffolk establishes a precedent for this type of development in this	The sensitivity of the AONB is assessed in section 28.7 of

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AONB Partnership	Section 42 Consultation Response	location. Whilst windfarms exist, it does not follow that the coastal waters have further capacity. The current distribution of windfarm development to the north and south of the study area, infact illustrates the sensitivity of the coast between Kessingland and Felixstowe which is designated as AONB and Heritage Coast and nationally valued.	this chapter and Appendix 28.4 . Conclusions regarding capacity for windfarm development are provided in section 28.13 of this chapter.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Para 16 of Appendix 28.1 (methodology) makes no reference to the Suffolk County Landscape Character Assessment although this is the assessment used to determine landscape and AONB effects.	The Suffolk County LCA is referred to in section 28.5.2 of this chapter 'The Suffolk County Council Landscape Character Assessment (Suffolk County Council, 2008/2011) define the baseline for the Suffolk section of the SLVIA study area'.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Para 32 of Appendix 28.1 sets out considerations in assessing susceptibility i.e. the ability of a defined landscape receptor to accommodate the specific proposed development without undue negative consequences ¹ . The assessment makes particular reference to the specific nature of development, seascape/landscape character and association. A number of observations can be made: <ul style="list-style-type: none"> • Where the specific nature of the development helps in understanding susceptibility, all aspects should be considered rather than drawing attention to one element of a scheme i.e. distance from the coast. • Where the influence of existing development influences susceptibility it should not be based on the simple presence or absence of development but the nature and influence of that development on character. • When considering association, especially association between coastal landscape and the sea, visibility of open water is not be necessary for a strong association to still exist. 	Addressed in Appendix 28.2 and summarised in section 28.3 of this chapter. Assessments made in Appendix 28.4 and summarised in section 28.7 of this chapter.
Suffolk Coast and Heath	25/03/2019	The definition of categories of 'magnitude of change' appear inconsistent. Para 15 of the methodology assessment indicates the use of 6 categories in assessing the magnitude of change and yet table A28.3 has only 4 (not	The intermediate categories 'medium-high' and 'medium-low' magnitude of change are

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AONB Partnership	Section 42 Consultation Response	including 'none'). definition is provided for the intermediate scales Medium-High or Low-Medium for landscape effects although they are provided in relation to magnitude of change for visual effects, table A28.7, page 24.	not described in Table A28.3 in Appendix 28.2 but should be read as sitting between the descriptions of High, Medium and Low magnitude of change. Use of intermediate categories is accepted in LVIA practice and accords with guidance. Intermediate descriptions have been removed from Table A28.7 . to be consistent with Table 28.2 of this chapter.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Page 13 of Appendix 28.1 sets out a series of bullets to assist with determining the size/scale of change. The third bullet makes reference to the presence of existing windfarm development which is considered to reduce the magnitude of change, if there is a level of integration, and developments form a unified and cohesive feature. However this is unlikely to occur in the context of large scale off shore windfarms which cover a significant area of the horizon, and especially so, along a designated coastline valued for its relationship with the open sea and unfettered skylines. In these circumstances existing windfarm development may already impinge on coastal character and special qualities. When combined with the proposed development, the increased spread and prevalence of this form of development can give rise to a high magnitude of change to key characteristics and special qualities.	The SLVIA does not identify any levels of 'high' magnitude change to key characteristics / special qualities of the AONB, as set out in section 28.7 of this chapter and Appendix 28.4 .
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The sensitivity of views appears to have been underestimated. Table A28.6 sets out that views within a designated landscape have a higher sensitivity. The views along the coast are known to be of high scenic quality reflected in the AONB designation and users of the foreshore are engaged in enjoyment of the natural environment and sea views. On this basis viewpoints from the foreshore for users of the natural environment would be expected to be high	Table A28.6 also set outs other factors which may reduce relative value or susceptibility to change, depending on the specific receptors and their activity. In many other instances, visual

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		yet in many instances they are categorised as Medium-High e.g. Viewpoints 6, 7, and 18.	receptors at coastal viewpoints, especially residents, are assessed as high (e.g. Viewpoints 3, 4, 6 and 7). The assessment in this chapter has been changed to accommodate increase in sensitivity to 'high' of AONB users of the foreshore engaged in enjoyment of the environment and coast.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	It is noted in para 14 that the different categories of magnitude of change again comprises four not six as highlighted in para 3.4.3 above.	The intermediate categories 'medium-high' and 'medium-low' magnitude of change are not described in Table A28.3 in Appendix 28.2 but should be read as sitting between the descriptions of High, Medium and Low magnitude of change. Use of intermediate categories is accepted in LVIA practice and accords with guidance. Intermediate descriptions removed from Table A28.7 in Appendix 28.2 to be consistent with Table 28.3 of this chapter.
Suffolk Coast and Heath	25/03/2019	Throughout the documentation the AONB is referred to as having few commanding viewpoints. This is considered misleading as the coastline has	The AONB management plan describes the AONB as having 'few commanding viewpoints'

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AONB Partnership	Section 42 Consultation Response	many extensive open and exhilarating long views up and down the coast as well as out to sea despite its low elevation.	(paragraph 1.8.2), to which the SLVIA has referred. The SLVIA does recognise throughout the opportunities for long distance and panoramic views including out to sea.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Cumulative effects between EA2 and EA1 have been assessed but cumulative effects with Sizewell C are only considered in relation to onshore development not offshore. The section of coast between Aldeburgh and Southwold will experience both the onshore development of Sizewell C and the offshore development of the proposed windfarms. Whilst Sizewell C is not strictly the same type of development it is nonetheless an energy development which effects the same coastline. The lack of assessment of the combined effects of Sizewell C and the offshore windfarms is a notable omission especially in the context of effects on the AONB landscape.	An assessment of additional cumulative effects with Sizewell C is outlined in section 28.9 of this chapter and Appendix 28.7 , covering the section of coast between Aldeburgh and Southwold.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	There are concerns regarding the assessment of the value of the four key landscapes types where they occur within the AONB. All four landscape types comprise notable areas of the AONB coast. As such these areas, where they fall within the AONB should have a high value as a result of the designation, their scenic quality and perceptual/experiential aspects as defined in Appendix 28.1 pages 9-10.	The value of these four key landscape types of the AONB has been increased to 'high' in the chapter and Appendix 28.4 .
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Page 12 of Appendix 28.3 describes susceptibility of landscape type 5 Coastal Dunes and Shingle Ridges and makes reference to the distance of the proposed development from the coast to imply susceptibility is tempered. This is misleading for two reasons – firstly the nature of offshore windfarm development is to introduce vertical elements within the seascape, therefore reference should also be made to height of turbines and lateral spread. To refer to distance alone downplays the susceptibility of the landscape to this type of development and runs the risk of double counting elements of the	The susceptibility of LCT5 (and other LCTs) has been assessed based on the specific nature of the proposed East Anglia TWO project (as recommended in GLVIA3), which includes (among other factors) its location at long distance offshore.

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		proposals which are taken in account during an assessment of magnitude of change.	The susceptibility of LCTs has been systematically reviewed, with some updates made in assessments in Appendix 28.4 , particularly on localised coastal portions of LCTs such as the Coastal Levels LCT.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	LCT 5 is considered to have a high susceptibility due to its direct association with the open sea which forms a setting to the landscape and on account of the high exposure of this type to the proposed development.	The susceptibility of LCT 5 has been changed to high (detailed in Appendix 28.4).
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	LCT6 is considered to have a medium susceptibility due to the openness of this landscape, its strong association with the sea and the simple, unfettered skylines and open horizons. This landscape is not considered to be visually contained and is susceptible to vertical structures breaking the skyline, even where there are no direct views of the sea. Furthermore, there are parts of this landscape which contain raised flood defences along river channels from which there are elevated views out to sea and along the coast.	The susceptibility of LCT 6 has been changed to medium (detailed in Appendix 28.4).
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	It is agreed that LCT 7 has a medium susceptibility at the coast. This landscape forms an important backdrop to low lying coastal areas and has views out to sea across these areas. As a result, this landscape has an association with the coast, and strong aesthetic qualities making it susceptible to the proposed development.	Noted.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	It is agreed that almost all of the viewpoints within the AONB are likely to experience significant adverse effects as a result the proposed windfarm. However in a number of places the susceptibility and thus sensitivity of visual receptors is considered to have been underestimated. Where visual receptors are engaged in the natural environment (as many are when visiting the AONB), and where views are focused on the coastline and out to sea, (as many are when visiting the coastal parts of the AONB), sensitivity is regarded	Viewpoint 10: The scenic quality is influenced by Sizewell A and B, and offshore intake/outfall structures in the nearshore waters. The sensitivity of the receptors at Sizewell Beach should be

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		<p>as high.</p> <p>On this basis, there are concerns regarding the assessment of a number of viewpoints such as Viewpoint 10 and 14. The sensitivity of Viewpoint 10 is assessed as medium to low on account of the influence of Sizewell A and B. However, directional views for most people visiting the area are out to sea and along the coast, where scenic quality is high, despite the presence of Sizewell. This is a popular viewpoint with facilities, where walkers and tourist come to enjoy the coastal landscape. The sensitivity of visual receptors is considered to be high and effects significant. Similarly for Viewpoint 14 the sensitivity of the visual receptor is considered to be high on account of the historic promoted viewpoint, and importance of the view in understanding and enjoying a key cultural heritage asset of the AONB. With the magnitude of change being medium-low the effects are also considered to be significant.</p>	<p>lower than other viewpoints in the AONB, on account of the immediate influence of Sizewell A and B at this viewpoint and the nearby stretches of the Suffolk Coastal Path. The SLVIA needs to recognise differences in sensitivity at different locations within the AONB and this is one example where the sensitivity of visual receptors is lower than other, more remote and less developed locations. Sensitivity has been increased to medium (from medium-low) but is not high. The effect remains as not significant with a medium magnitude of change.</p> <p>Viewpoint 14: Sensitivity of receptors increased to high, however there are a number of mitigating factors which are explained in the SLVIA which result in the medium-low magnitude and not significant effect assessed.</p>
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	<p>The SLVIA included a detailed assessment of the effects on the Suffolk Coast Path. Para 208 of Chapter 28 highlights that the repeated exposure to the proposed windfarm can lead to significant effects. The same must equally apply to the wider AONB.</p> <p>The England Coast Path is being development for this section of coast by</p>	<p>Significance of effects is assessed in detail in Appendix 28.4 across different LCTs within the AONB to form an assessment</p>

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		Natural England and will adopt the Suffolk Coast Path for some of its length but in places provide new sections which focus more specifically on the coast and on enjoyment of sea views. This means that in future the effects of the proposed development on coastal paths is likely to be greater than has been assessed.	of the geographic extent of effects on its landscape character. England Coastal Path proposals to incorporate the Suffolk Coastal Path will be finalised and published in autumn 2019 and the new access is expected to be ready in 2020. In the meantime, the SLVIA assesses effects on users of the Suffolk Coastal Path.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	There appears to be no assessment of the effects of the proposed windfarm on cultural heritage interest, including cultural associations. This is an important oversight as cultural heritage forms a key component of the AONB comprising many historic sites along the coast. Frequently historic sites and assets comprise singular vertical structures which contrast with the otherwise strongly linear and horizontal landscape e.g. Orford Ness or Southwold Lighthouses, Orford Castle or Martello towers. These historic assets, many of which are listed, depend upon the open sea to give them significance and meaning. Similarly, no reference is made to cultural associations including works of art, that like heritage assets, may depend on the seascape setting for their context and aesthetic qualities e.g. The Clam.	Cultural Heritage settings assessment provided in Chapter 24 Onshore Archaeology and Cultural Heritage (and is not part of SLVIA).
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The conclusion in EA2 Chapter 28 para 161 that only LCTs 05 and 07 are affected is questioned. Whilst types 06 and 08 may not be visually connected to the sea the presence of the sea and coastal location of these landscape remains perceptible not least because of the sense of openness beyond the type. In places the turbines will break the skyline, their vertical form in a horizontal landscape, and their movement, will intrude on these landscapes. The visual intrusion of turbines into these landscape, as indicated on the ZTV,	Assessments of LCT 06 and 08 have been updated in section 28.7 of this chapter and Appendix 28.4 with finer granularity of assessment and

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		has been underestimated. Therefore, a more substantial part of the coastal stretches of the AONB is likely to be adversely affected by the proposed windfarm development.	consideration of the coastal portions of these LCTs.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Para 162 of EA2 Chapter 28 missed the inextricable link between the land and sea which is fundamental to the special qualities and enjoyment of the AONB. The open, unfettered sea views, their expansive and natural qualities are highly susceptible to the introduction of vertical structures which will stretch for c. 30km. The proposed development may be sited some distance from the coast but the degree of impact is also dependant on the height of the structures and the value placed on the open, wild and natural characteristics of the sea and the extent to which this gives rise to special qualities along the coast.	Sea views are not entirely unfettered, with numerous large vessels and clutter created by existing offshore wind turbines at Greater Gabbard and Galloper (as stated in the AONB special qualities report). Further narrative text has been added within this chapter to describe the link between land and sea/simplicity of landscape elements of land/sea/sky at the coast.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	There is an unreasonable reliance on the existence of existing windfarm development along the coast in the assessment of effects. The reality is that Great Gabbard and Galloper windfarms, although located at similar distances to EA2, are in fact significantly smaller in height. Furthermore their smaller extent ensures they affect a more limited area of the AONB. In contrast the EA2 and EA1N windfarms will affect c. 40km of the SC&H AONB which is only 50km in length in its entirety. The effects of EA2 or EA2 and EA1N in combination will give rise to a pervading presence of windfarms as perceived from the AONB.	Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators report (LDA 2016) acknowledges the influence and clutter of existing windfarm development in the AONB. There are locations where the height of Galloper/Greater Gabbard appears comparable to the proposed East Anglia TWO offshore windfarm. The combined extent of Galloper and Greater Gabbard is comparable to the proposed

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			East Anglia TWO project (Figure 28.9) in the closest views. As assessed in the SLVIA, the influence of the proposed East Anglia TWO project is restricted to the coastal edge of the AONB and will not be the pervading influence throughout the AONB.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The SLVIA considers at para 152 of Chapter 28 that the effect of EA2 would not give rise to a windfarm seascape but that it would comprise a seascape with windfarm. However this cannot be an acceptable circumstance where a national landscape designation lies adjacent and especially a landscape dependent on the inter-relationship with the sea for its special qualities.	The AONB is not 'adjacent' to the East Anglia TWO windfarm site but is approximately 32.5km distant at its closest point. There are several examples of seascapes containing windfarms in locations offshore from nationally designated landscapes.
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The 'curtaining' effect of the proposed windfarm development cannot be assessed simply by the extent of the horizon affected by windfarm development from a specific viewpoint. It must also take account the extent of the coast which has sequential views of the proposed development such that it would not be possible to get away from this type of development when experiencing the vast majority of the AONB coastal landscapes.	Sequential views are assessed from the Suffolk Coastal Path in Appendix 28.6 . There are very few other receptors that provide a sequential experience of the coast, with no major roads or railway lines.
Suffolk Preservation Society	20/03/2019	The Technical Summary at para 161 states that the wind turbines are likely to only be visible to the public 33% of the time under conditions of excellent visibility. Clarification is required on whether this refers to all daylight hours and whether this will vary throughout the year. In addition this likely period of	The figures quoted are based on Met Office visibility data, which is provided in Appendix 28.8 and includes seasonal

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	Section 42 Consultation Response	visibility must also been taken in context of the public wishing to benefit from and enjoy this seascape character during the same periods of 'excellent visibility' rather than periods of poorer visibility. Therefore the actual resulting impact will be much greater than just the proportion of time of visibility.	variation in Plate A28.3 . It is noted that visual impacts are likely to be experienced by a greater number of people during periods of excellent visibility (than periods of poor visibility for example), however this does not change the findings presented from this Met Office data.
Suffolk Preservation Society	20/03/2019 Section 42 Consultation Response	It is essential that the assertions over the visibility of the turbines from the coast, made in the technical summary, can be fully evidenced. At an early engagement meeting SPS was specifically advised by SPR that the offshore array would not be illuminated other than on the four outer corners of the windfarm. However, the visualisations clearly show that all turbines are illuminated, LVIA chapter 28, Visualisations Viewpoint 4 Southwold figure 28.29g, Viewpoint 2 Kessingland Beach figure 28.27f and Viewpoint 1 Lowestoft figure 28.26f. Based on these visualisations and the wording within chapter 6 para 6.5.5 it is fair to conclude that the lighting will be on throughout all hours of darkness, 'flashing simultaneously' and creating what can only be described as a potential 'seaside illumination' effect where there is currently none. Clarification is required regarding the hours and style of illumination.	The evidenced is provided by Met Office visibility data in Appendix 28.8 . Significant peripheral wind turbines will be lit with red, medium intensity aviation warning lights as required by legislation and described in section 28.3 of this chapter.
Suffolk Preservation Society	20/03/2019 Section 42 Consultation Response	The PEIR remains silent on the location and visual impact of the two off shore platform structures that are required to service the wind turbines. Clarification is required to address this issue.	Indicative Offshore Substation Platforms and Indicative Accommodation Platform is shown in Figure 28.1 .
Waveney District Council	26/03/2019 Section 42 Consultation Response	We support our colleagues at Suffolk Coastal District Council and Suffolk County Council in highlighting significant concerns with the predicted offshore effects on seascape, coastal landscapes, character and qualities of the Suffolk Coast and Heaths Area of outstanding Natural Beauty (AONB), coastal receptors, settlements and users of the Suffolk/England coast path. In	Likely significant effects of the construction and operation of the offshore infrastructure assessed on these seascape, landscape and visual receptors

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		particular, the East Anglia Two (EA2) project will result in a significant change to the sea views from key viewpoints on the AONB coast including from Kessingland, Covehithe and Southwold, popular tourist destinations, with the result being a horizon that is cluttered with turbines. This impact will be continuously experienced along the coastline and further exacerbated when viewed in combination with East Anglia One North (EA1N) and other existing wind farm arrays in the North Sea.	are assessed in sections 28.6, 28.7 and 28.8 of this chapter and Appendices 28.3 - 28.7 .
Waveney District Council	26/03/2019 Section 42 Consultation Response	We support our colleagues at Suffolk Coastal and the County Council in stating that the assessment to date does not give sufficient weight to the contribution the current uncluttered seascape makes to the condition and character of the coastal landscape and its visual amenity. The assessment also does not give sufficient weight to the contribution the current uncluttered seascape makes to the setting, character and special qualities of the AONB. The concerns we raise in relation to this are serious, in particular it is considered that the degree of visual impact that the proposed EA2 windfarm in particular, and in addition to and in combination with, the coast-side elements of EA1N, and the Galloper array to the south from certain viewpoints, will have on the character of the East Suffolk shore and its immediate seascape areas is significantly adverse.	The simple composition of sea views is referred to throughout the SLVIA (and Appendix 28.5). The seascape setting of the AONB is not entirely uncluttered, with large vessels and existing wind turbines present. Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators report (LDA 2016) states that ' <i>Offshore wind turbines at Greater Gabbard, Galloper and the more distant London Array are visible from some stretches of the coastline. These create a cluttered horizon and, like the large-scale elements onshore, also divide opinion</i> '. Significant effects are limited to the East Suffolk shore and its immediate seascape areas.
Waveney District Council	26/03/2019	It is appreciated that the turbines themselves will be limited in the time of when they will be visible from shore and that the proposed 300m height to tip	Embedded mitigation in the form of a revised East Anglia

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	Section 42 Consultation Response	is currently an aspiration and not actually available technology at this stage. However, EA2 is closer to the shore than the existing East Anglia One (EA1) and consented East Anglia Three (EA3) arrays that have maximum turbine heights of 250m. As such, the potential impacts arising from EA2 are greater. We would be happy to discuss the potential for mitigation of these impacts as it is likely they will most greatly be felt during peak tourist season, this is a concern particularly around Kessingland, Covehithe and Southwold where tourism and the coast are a massive draw to visitors, holiday makers and second-homeowners. Mitigation could include a reduction in the height of the turbines or alterations to the layout of the arrays to minimise impacts. We would welcome discussions as part of East Suffolk Council on this element.	TWO windfarm site layout, as described in section 28.3.3 of this chapter. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b . Effects on views experienced by people at Kessingland, Covehithe and Southwold are assessed in section 28.8 of this chapter and Appendix 28.5 .
Waveney District Council	26/03/2019 Section 42 Consultation Response	Impact on tourism and recreation resulting from landscape and seascape impacts during the construction and operation phases along with associated mitigation strategies is an area we are particularly concerned with and look forward to being involved in discussions prior to the development consent orders being submitted.	Embedded mitigation measures in the form of a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. Effects on tourism and recreation are assessed in Chapter 30 Tourism, Recreation and Socio-Economics .
Waveney District Council	26/03/2019 Section 42 Consultation Response	The SLVIAs identified significant effects from the offshore infrastructure of EA2 and EA1N and EA2 cumulatively on the AONB. The AONB and Heritage Coast are designations which are largely based on the tranquillity and unspoilt nature of the area. It is this natural asset which tourists come to visit. We are concerned regarding the harm caused to the purpose of the designations and the consequential impact on the tourist industry. This harm	Embedded mitigation measures in the form of a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. Effects on tourism and recreation are assessed in Chapter 30 Tourism,

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		cannot easily be mitigated and therefore SPR should be providing compensation.	Recreation and Socio-Economics.
Historic England	26/03/2019 Section 42 Consultation Response	We note the SLVIA chapters and the viewpoints provided in the associated appendices for EA1N & 2. The primary concern for Historic England is the cumulative impact of the two wind farms in association with other windfarms on a number of key coastal designated heritage assets. We note that visualisations and photomontages have been provided which helpfully illustrate a number of these locations, and it is clear there will be some visibility from a number of these assets. The impact will clearly need to be assessed and set out in the ES in relation with reference to the photomontages.	Effects on setting of coastal designated heritage assets to be addressed in Chapter 24 Onshore Archaeology and Cultural Heritage. Photomontages shown in Figures 28.25 – 28.55.
Historic England	26/03/2019 Section 42 Consultation Response	Section 28.2.1 ‘SCT 03: Nearshore Waters’ within EA2 and EA1N Offshore Windfarm - Appendix 28.2 ‘Seascape Assessment’ details that onshore, to the north and south of the export cable route landfall a “strategically important coastline with numerous fortifications still visible including Napoleonic and Second World War structures and Cold War military establishments” is represented. As such, this (past) strategic importance also connects to the offshore seascape, and to the known and as yet unrecorded heritage assets that lie on the seabed within and close to the proposed development area. Principally those associated with military actions from the First and Second World Wars.	Reference to strategic importance of coastline has been added to baseline description of SCT 06 Offshore Waters in Appendix 28.3.
Natural England	26/03/2019 Section 42 Consultation Response	Natural England has two principal concerns about the predicted significant adverse effects of the proposed EA2 scheme on the seascape setting and statutory purposes of the Suffolk Coast and Heaths AONB (and associated Suffolk Heritage Coast). Firstly the size (height and mass) of the turbines proposed in both the worst case scenario and alternative technology options is significantly greater than we’ve been presented with for other offshore wind energy schemes affecting a National Park or AONB. Secondly the northward geographic spread of the array, combined with the cumulative effects of EA2 and the EA1N proposal will result in turbines occupying the majority of the seaward horizon of the AONB.	Embedded mitigation measures for the northward spread in the form of a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. The size of the 300m blade tip height turbines shown in the photomontages (Figures 28.25 - 28.54) are worst-case for SLVIA. Visualisations

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			showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
Natural England	26/03/2019 Section 42 Consultation Response	Natural England agrees with the majority of the visual baseline, landscape / seascape baseline and realistic worst case scenario statements; see below for specific details although we disagree with the characterisation of SCT 06 Offshore Water. Natural England agrees with the majority of the SLIVA methodology although we have concerns about elements associated with: <ul style="list-style-type: none"> - visibility, - reversibility, - the consideration of night time effects for urban areas only, - the scoping out of the coastal occurrences of some LCTs, - the incorporation of maintenance activities into the assessment of the operational phase 	Agreements on the majority of the baseline and worst-case scenario welcomed and carried into this chapter and Appendices. Responses/actions taken to address each of the identified concerns (e.g. visibility, reversibility etc) are set out for each point in turn as part of the following responses.
Natural England	26/03/2019 Section 42 Consultation Response	Natural England agrees with the majority of the judgements on the significance of effects as detailed in the SLIVA but disagrees with a number of them.	Agreements on the majority of the judgements on the significance of effects are welcomed. Responses/actions taken to address each point of disagreement are set out for each in turn as part of the following responses.
Natural England	26/03/2019 Section 42 Consultation Response	Natural England is concerned that the summary and conclusion presented do not accurately reflect the narrative and judgements contained within the SLIVA.	Conclusions in section 28.13 of this chapter have been expanded to reflect the narrative and judgements contained within the SLIVA.

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Natural England	26/03/2019 Section 42 Consultation Response	Note about turbine height and proximity to the coastline of a designated landscape - The last 10 years has witnessed a significant upscaling of the technology used by the offshore wind energy industry. Over this period turbines have increased both in output capacity and size from the 132m high 3.6MW machines (Sheringham Shoal, Norfolk Coast AONB, closest point to shore 17km) to 181m high 6.3MW machines (Galopper, Suffolk Coast and Heaths AONB; closest point to shore 29.3km), and now the new emerging industry 'standard' of 15MW machines reaching a height of 300m height as proposed for EA2 (closest point to shore 29.6km). This means that capacity has increased nearly fourfold and turbine height has more than doubled. When viewed from the same location, the bigger the structure the greater it's visual prominence. Similarly, the bigger the structure the greater the distance (and geographic spread) from which it can be seen, and the greater the likelihood that individual structures or a collection of them will be prominent within or defining components within a landscape or seascape view. This is especially the case for offshore wind energy turbines and arrays because there is no means to screen them. These facts and basic principles have guided our appraisal of this scheme and the formulating of our comments and advice. We have also used our experience of and drawn comparisons between previously consented offshore wind energy schemes located in the seascape setting of a designated landscape and EA2 to illustrate the likely influence of this upscaling in technology.	The narrative on turbine height and proximity to the coastline of designated landscapes are noted and evidence some precedent. At approximately half the height and distance compared to the proposed East Anglia TWO project, the Sheringham Shoal 132m high 3.6MW machines at 17km from the Norfolk Coast AONB provide some precedent for turbines of a similar vertical scale experienced from an AONB. The 181m high 6.3MW Galopper turbines are also several kilometres closer to the Suffolk Coast and Heaths AONB than the East Anglia TWO windfarm turbines (although of lower blade tip height).
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.3.1, para. 13 Natural England notes and accepts the reasons used to define the study area	Agreements on the SLVIA study area is welcomed and carried into this chapter and Appendices.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.3.1, para. 16 and 17 App. 28.1, para. 129 App. 28.7, para. 5 The information and evidence about visibility is important additional information about the character of the seascape setting of the SCHAONB and SHC. It is certainly a key factor in defining the worst case scenario for a	Frequency of effect is not a factor in judging the significance of effects assessed for each receptor in the SLVIA, i.e. it does not form part of the magnitude of

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		<p>scheme which requires good visibility with clear views to the horizon as acknowledged at 28.7 para. 4 p1.</p> <p>With reference to the Met Office visibility data presented in Plates A28.1 - 3 for Weybourne, A28.4 - 6 for Shoeburyness and commentary in para. 34 p.8-9. Although these places are located some distance away from the study area we accept that this data provides a useful approximate guide to the probable nature of seaward visibility from the Suffolk coast. It is clear from the data presented that the visibility conditions which occur most frequently (for Weybourne 34% and Shoeburyness 35% of the time) allows for views off-shore which extend to 40km. These views are classified as 'very good'. At its closest point to the AONB coast line EA2 is 29.6km distant, whilst approximately 22 (36%) turbines and potentially 4 other associated structures are located within 40km (numbers derived from measures taken from Figure 28.1). Visibility conditions which are classified as 'excellent' occur at a frequency of 20% and 9% respectively. As would be expected periods of 'very good' and 'excellent' visibility occur most frequently during the summer. Outdoor recreational activity in the SCHAONB (reflected in the visual receptor groups identified in the visual assessment) is at its peak in the summer months (as acknowledged in 28.1 para. 129 p.44)</p> <p>GLVIA3 makes no reference to the frequency of when 'very good' conditions are likely to exist in determining the worst case scenario and as a result frequency is not a factor in judging the significance of effect. Natural England advises therefore that the statement contained in the first sentence of 28.7 para. 5, although useful in terms of context, is discounted as it is not a factor in judging significance. Natural England agrees with the statement contained in the second sentence of this paragraph as this is based on the conclusion of the visual assessment</p>	<p>change assessments, which assume excellent visibility conditions. Observations on potential frequency of effect are provided alongside significance judgements, with agreement from Natural England that the Met Office data from Weybourne and Shoeburyness provides a useful guide to the probable nature of seaward visibility from the Suffolk coast.</p> <p>The first sentence of section 28.7 paragraph 5 of this chapter is retained as it remains valid - the potential for significant effects to occur will be limited to periods when clear views of the East Anglia TWO windfarm site are available.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>App 28.7, para. 7, 11 and 19</p> <p>We also offer the following comments; Para. 7. We note the reference to windfarms in the English Channel in the final sentence and understand that the report was in published in 2012 with fieldwork presumably being undertaken in 2011. In 2011 there were no windfarms located in the English Channel; the first and only such scheme</p>	<p>The Bureau of Ocean Energy Management study is referenced in the SLVIA, which sets out all the windfarms considered in this report, available at:</p>

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		<p>located in the English Channel to date is Rampion, the construction of which commenced in 2015. Clarification of the actual windfarms included in the quoted study would therefore be helpful.</p> <p>Para. 11. We note that the maximum height of the turbines included in the study quoted is 153m whereas the EA2 turbines used in the worst case realistic scenario are 98% taller. Consequently, whilst this study is of interest to Natural England, we fail to understand how it relates to the sensitivity of the visual receptor groups used in the Visual Impact Assessment.</p> <p>In para. 19 we note the reference to horizontal extent and agree with this statement and the final sentence.</p> <p>We would like to see the relationship between visual receptors and visibility articulated more fully in the Visual Impact Assessment in order to better understand the relevance of appendix 28.7</p>	<p>http://visualimpact.anl.gov/offshoresite/</p> <p>As stated in Appendix 28.8, the study does not attempt to assess whether potential visibility would be significant or not (or the sensitivity of receptors) but it provides a useful aid to ascertaining the likely potential for visibility of existing offshore wind farms at various distances.</p> <p>The frequency of effect derived from the Met Office data in Appendix 28.8 is provided alongside significance judgements in the SLVIA.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>section 28.3.2, para. 32</p> <p>We note the limited opportunities to mitigate the significant adverse effects of the scheme through a reduction in the geographic extent of the array (the design) and/or the size of the chosen technology (the turbines). As the only mitigation measures available to reduce the adverse significant effects on the statutory purposes of the SCHAONB would be via such measures we conclude that such a reduction is not possible and therefore no mitigation measures other than those already embedded in the design are available to reduce the identified effects to not significant. The judgements contained in the SLVIA indicate that these embedded measures have failed to sufficiently reduce the level of significance for all landscape, seascape and visual receptors.</p>	<p>Embedded mitigation measures in the form of a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b.</p> <p>The revised project design presented in this ES therefore represents a reduction in the geographic extent of the East</p>

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			Anglia TWO windfarm site, whilst maintaining its generation capacity. The change has resulted in reduction in seascape, landscape and visual effects, as assessed in the SLVIA.
Natural England	26/03/2019 Section 42 Consultation Response	section 28.3.2, para. 42 we note the reference to the Round 3 SEA and the siting of turbines outside of territorial waters and the further reference to the distance of 13km off the coast of a designated landscape and/ or Heritage Coast. We understand the latter to originate in the 2006 DTi Guidance. We note that the when the Round 3 SEA was undertaken c. 2010 the 'industry standard' turbine i.e. those then being installed and/ or planned for was up to 200m whilst in the 2006 this 'standard' was 132m. The heights of the turbines used to defined the EA1N worst case scenario for are respectively 50% and 225% taller.	The fundamental point made in the SLVIA in section 28.3.2 of this chapter remains the same regardless of turbine height, i.e. that siting offshore windfarms at long distance offshore from designated coastal landscapes will help to mitigate potential landscape and visual impacts.
Natural England	26/03/2019 Section 42 Consultation Response	section 28.3.2, para. 32 section 28.3.3, para. 43 The embedded mitigation referred in para. 43 reflects the requirements set out by the relevant regulatory authorities (as described earlier in para. 39) and refers to only night time lighting associated with safety. These are also an operational requirement of the design. Natural England concludes that the only 'reasonable mitigation' (as required by NPS EN-1 para. 59.9.17) set out are those required by other regulatory authorities concerned with navigational safety in that the minimum requirement has been applied. Although located well beyond the distances recommended by the Round 3 SEA the significant increase in turbine height (and bulk) since this assessment means that that reliance on these figures may no longer be relevant.	The fundamental point made in the SLVIA in section 28.3.2 of this chapter remains the same regardless of turbine height, i.e. that siting offshore windfarms at long distance offshore from designated coastal landscapes will help to mitigate potential landscape and visual impacts.
Natural England	26/03/2019	Section 28.4.3.8, para. 66 and 67 Throughout the landscape, seascape and visual assessments frequent	The ES assesses operational effects as long-term (and

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Natural England	26/03/2019 Section 42 Consultation Response	Section 28.5.1.2, Para. 87 and 98 Natural England restricts its comments to those SCTs which form the seascape setting of the SCHAONB and within which the EA2 site is located, namely SCT 06 Offshore Waters (para. 98). We note para. 87 and welcome the clarity this provides.	This is noted. Responses provided to comments on specific SCTs below.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.5.2, para. 117 Natural England restricts its comments to those Suffolk County Council LCTs that make up the SCHAONB and include coastal components within their character. These are: LCT 05 Coastal Dunes and Shingle Ridges (Areas C, D and E only) LCT 06 Coastal Levels (Areas B, C, D and E) LCT 07 Estate Sandlands (Areas A, B, C and D) LCT 08 Open Coastal Fens (Areas 1, 2 and 3) LCT 20 Saltmarsh and Intertidal Flats (Ordford Ness only) LCT 25 Urban (Aldeburgh and Southwold)	This is noted. Responses provided to comments on specific LCTs below.

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		LCT 29 Wooded Fen (Pottersbridge Marsh, Covehithe Broad and Benacre Broad)	
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.5.2, para. 117 We note that following 3 LCTs were scoped out of the assessment; LCT 20 Saltmarsh and Intertidal Flats (Orford Ness), LCT 25 Urban, LCT 29 Wooded Fen (Pottersbridge Marsh, Covehithe Broad and Benacre Broad).</p> <p>We accept the reasons for scoping out LCT 25 (for Southwold and Aldeburgh) as set out in 28.3 Table A28.1 p.5 and note the location of 5 viewpoints within this LCT. In order that all LCTs located on the coast of the SCHAONB are included within the SLVIA Natural England requests that an assessment for LCTs 20 and 29 is undertaken. For LCT 20 and 29 our reasoning is as follows; LCT 20 Saltmarsh and Intertidal Flats (Orford Ness only): A portion of this LCT reaches down to the coast and although views out to sea may be obscured by the intervening ridge of shingle, and so do not contribute to the character of this LCT, we wish to see evidence to confirm this. LCT 29 Wooded Fen (3 separate areas comprising Pottersbridge Marsh, Covehithe Broad and Benacre Broad): Although views out to sea may be obscured by the intervening ridge of shingle and not contribute to the character of this LCT we wish to see evidence to confirm this. We do not recognise the description contained in 28.3 Table A28.1 p.6 'substantial intervening screening provided by wooded fen' for this LCT at Covehithe Broad.</p>	Additional assessment of LCT20 Saltmarsh & Intertidal Flats (Orford Ness) and LCT29 Wooded Fen is provided in Table A28.1 in Appendix 28.4 , however they remain scoped out of the detailed impact assessment.
Natural England	26/03/2019 Section 42 Consultation Response	Natural England is unsure as to why the assessment of night time effects has been restricted to LCT 25, which only affects the urban areas of Southwold and Aldeburgh. Dark skies are an important component of the character of the SCHAONB coast line and it is clear from the figures 28.29g and 28.38f that the aviation navigational lighting affixed to EA2 has the potential to adversely affect this. Our experience of other OWF suggests that aviation	The effects of the aviation lighting of the turbines on people at night are assessed as visual effects (not landscape effects). Night-time lighting will not affect the

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		<p>navigational lighting is a conspicuous feature when viewed from the shore and that atmospheric conditions such as sea fog can actually amplify it's influence.</p> <p>Therefore we wish to see an assessment of the effects of night time of navigational lighting on the following LCTs: LCT 05 Coastal Dunes and Shingle Ridges (Areas C, D and E only) LCT 06 Coastal Levels (Areas B, C, D and E) LCT 07 Estate Sandlands (Areas A, B, C and D) LCT 08 Open Coastal Fens (Areas 1, 2 and 3) LCT 20 Saltmarsh and Intertidal Flats (Ordford Ness only) LCT 25 Urban (Aldeburgh and Southwold) LCT 29 Wooded Fen (Pottersbridge Marsh, Covehithe Broad and Benacre Broad)</p> <p>We request that a visual assessment is undertaken for the receptor group 'beach users' from the viewpoints located within the relevant LCTs</p>	<p>perception of landscape character. The character of the landscape is not readily perceived at night in darkness, particularly in rural areas. While aviation lighting will be visible from the shore and result in visual effects, as assessed in the SLVIA, it will not result in changes to the character of the landscape. Visual assessment of night-time visual effects is undertaken for the receptor group 'beach users' in the visual impact assessment in Appendix 28.5.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.5.2, para. 119 Natural England notes that the SLVIA includes an assessment of the likely effects of the scheme on the special characteristics and qualities of the SCHAONB and welcomes this inclusion.</p>	<p>Noted and included in Appendix 28.4.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.5.3, Table 28.7 Natural England notes the viewpoints listed in this table and their classification as either representative or illustrative. We are content with how the viewpoints have been classified. Natural England restricts its comments to those viewpoints which are located within the SCHAONB and are strongly associated with the natural beauty of this area. For reference these are: 3. Coverhithe 4. Southwold 5. Gun Hill, Southwold 6. Walberswick</p>	<p>Agreements on the classification of viewpoints is welcomed and taken forward into Chapter and Appendices. AONB viewpoints are noted, with responses provided below to specific comments on viewpoints/visual effects.</p>

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		7. Dunwich 8. Dunwich Heath and Beach (Coastguard Cottages) 9. Minsmere Nature Reserve 10. Sizewell Beach 11. Suffolk Coastal Path between Thorpeness and Sizewell 12. Thorpeness 13. Aldeburgh 15. Shingle Street 16. Bawdsey 18. Orford Lighthouse	
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.5.4 Natural England fails to understand the relevance of this section to defining the existing landscape baseline against which the significance of this scheme will be judged. The aims and objectives of the SCHAONB Management Plan (para. 138) focus on the conservation and enhancement of the natural beauty of the designation and will help guide future development. As national planning policy (NPPF para. 170) seeks to limit major development in designated landscapes it is unlikely that the baseline conditions, as they relate to the developed environment, will alter greatly in the forthcoming decades. The exception is Sizewell C, the DCO for which is yet to be submitted.	Recent UK EIA guidance and the new EIA Directive reaffirms that the anticipated trends in baseline conditions, which would likely transpire due to natural or man-made processes, in the absence of a planned development, require consideration. These are described in section 28.5.4 of this chapter.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.5.4, Para. 139 Natural England accepts the reasoning set out in this paragraph but is concerned about the conclusions drawn. SPR is correct in stating that the seascape covered by the study (and the wider seascape of the southern North Sea) is increasingly characterised by the presence of a number of large offshore windfarms. However, we consider that it is incorrect to assume that the acceptable landscape and seascape change which this has produced sets a precedent for EA2.	Agreement that the study area seascape (and the wider seascape of the southern North Sea) is increasingly characterised by the presence of a number of large offshore windfarms is welcomed. This paragraph of the SLVIA does not state that this makes the changes resulting from the proposed East Anglia TWO

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			project acceptable, but it does offer recognition that it fits with the established approach of 'accommodation' of offshore wind energy development in parts of the study area seascape.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.5.4, Para. 139 The landscape referred to in the text covers the entirety of the study area and fails to differentiate between designated and non-designated landscape. We contend that whilst the landscape change identified may be deemed acceptable for non-designated landscape this does not justify the significant adverse effects predicted for the EA2 on the nationally designated landscape of the SCHAONB.	This paragraph of the SLVIA does not state that this makes the changes resulting from the proposed East Anglia TWO project acceptable, but it does offer recognition that it fits with the established approach of 'accommodation' of offshore wind energy development in parts of the study area seascape.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.5.4, Para. 139 We note the SLVIA assessment for the Galloper WF scheme judged its landscape and visual effects to be either minor or negligible and therefore not significant. Natural England agreed with this judgement. So although visible from the southern portion of the SCHAONB this reference to the Greater Gabbard and Galloper arrays is potentially misleading as these schemes have not resulted in a significant adverse effect on the statutory purposes of the SCHAONB. In contrast however, the SLVIA EA2 does conclude there will be a significant adverse effect on the SCHAONB and also greatly extends the northward spread and visual influence of turbines further across the seascape setting of the designation.	Galloper is largely located behind/subsumed behind the Greater Gabbard wind farm, which is the primary reason for assessments of minor and therefore not significant visual effects in the Galloper ES. The combined effect of Galloper and Greater Gabbard is greater, particularly on some of the southern and closest areas of the AONB between Orford Ness and Bawdsey, e.g. Viewpoint 18 (Figure 28.43b)

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			<p>where the vertical scale of the closer Greater Gabbard/Galloper turbines (from 25km) appears similar to the East Anglia TWO windfarm site and occupies a wider lateral spread on the skyline. There are areas of the AONB where the effects of the combined Greater Gabbard/Galloper wind farms are comparable to those predicted for East Anglia TWO. While these effects of Greater Gabbard/Galloper may not have significant adverse effects on the statutory purposes of the SCHAONB, there is clearly an offshore windfarm influence in the seascape setting of the AONB. This is recognised in the AONB special qualities report as creating 'clutter' on the visual horizon.</p> <p>Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. Visualisations showing this mitigation (the difference between the East</p>

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			Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.5.4, Para. 139 NPS EN-1 states that the ‘aim should be to avoid compromising the purposes of the designation and that projects should be designed sensitivity’. The consideration therefore is good design and not the precedent set by other schemes.	Embedded mitigation measures which aim to avoid compromising the purposes of the AONB designation is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 We note that the maintenance activities associated with the operational phase of the scheme have not been incorporated into the seascape assessment. (see Chapter 6 6.5.16.2 para. 240 p.63 – 64) for details of these. We therefore ask that this is done.	Maintenance activities have now been included within the operational effects assessments in this chapter and Appendices 28.3-28.7 .
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 SCT 06 Offshore Waters The narrative fails to note SCT06 forms a part of the distant seascape setting of the SCHAONB. The assessment should acknowledge this and the seascape assessment should be revised accordingly. Please see our comments below regarding para.150 for more details.	Increased reference to the role of SCT06 forming part of the distant seascape setting to the AONB has been added in section 28.6 of this chapter and Appendix 28.3 .

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Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 SCT 06 Offshore Waters</p> <p>Natural England acknowledges that the character of SCT 06 is shaped by considerable human activity (as listed in para.148), but notes that the onshore visual influence of OWFs is confined to a southern group (Greater Gabbard and Galloper) and that the 3 arrays which include East Anglia 1 are out of sight when viewed from the SCHAONB. These will be joined by the now consented EA3, which will also be out of sight of the shore. Therefore, only the southern group are within the seascape setting of the designated landscape. And as set out in point 14 above these, unlike the predicated effects for EA2, do not have an adverse effect on the statutory purposes of the SCHAONB.</p>	<p>Agreement that the character of SCT06 is shaped by considerable human activity is welcomed. This is noted in the key characteristics of SCT06 in the Suffolk, North Essex and South Norfolk Seascape Assessment and adopted in the SLVIA baseline description of this SCT. Although the onshore visual influence is only from Greater Gabbard/Galloper, it is a fact that there are 3 operational offshore windfarms located in this SCT (Figure 28.10) and East Anglia THREE is also consented. In the offshore context of the SCT, these operational windfarms form characteristic elements, regardless of whether they are viewed from the coast, as they are part of the pattern of elements in the SCT and they are visible to receptors offshore.</p> <p>The assessments of SCT06 in section 28.6 of this chapter and Appendix 28.3 have been updated to clarify the onshore visual influence of these</p>

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			windfarms in SCT06 have on the setting of the AONB.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 SCT 06 Offshore Waters We also note that this is described as a 'vast and featureless seascape with an expansive open character with consistent panoramic horizons' (para. 148); the characteristics which contribute most to the natural beauty of the seascape setting of the SCHAONB.	In Appendix 28.3 , reference has been added to this characteristic as contributing most to the value of SCT06 and increased from low to medium to reflect the role it plays as part of the wider seascape setting to the AONB.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 SCT 06 Offshore Waters Whilst we agree with the judgement in para. 149 of no significant effects we disagree that this SCT is predominantly characterised by offshore development activities. The geographical extent of this SCT is very large and the area of the EA2 array, which forms a part seascape setting of the SCHAONB, is not characterised by such developments. It is instead characterised as a 'vast and featureless seascape with an expansive open character with consistent panoramic horizons'. So although EA2 will not redefine the character of SCT 06 it will, and crucially, redefine that portion of the it which forms the seascape setting of the AONB.	Agreement on judgement of no significant effects on SCT06 is welcomed. Appendix 28.3 now has an added reference to role and effects on seascape setting of AONB. The effects assessment for SCT06 focuses on changes in offshore character as a result of new features that will be located within the SCT and how they change its pattern of elements. The effects of the construction and operation of the offshore infrastructure on the setting of the AONB and the onshore LCTs which define its character are assessed in section 28.7 of this chapter and Appendix 28.4 .

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Natural England	26/03/2019 Section 42 Consultation Response	Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 The inference in para.150 that the seascape setting of the SCHAONB only extends offshore as far as the SCT 03 Nearshore Waters is incorrect. As the evidence on visibility contained in Appendix 28.7 illustrates offshore visibility extends well beyond this SCT and the adjacent SCT (SCT 05 Coastal Waters) and into SCT 06.	For SCT06 a description of geographic extent has been added to Appendix 28.4 to include reference to offshore visibility extending beyond this SCT.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 We agree with the judgement of significant effects on SCT 03 as set out in para. 151. Para.152: Whilst we agree that the character of this seascape has been allowed to change from the location of several OWF within we refer again to the point made above for para.149 and as set out in point 14	Agreement that the character of this seascape has been allowed to change due the location of several OWFs is welcomed.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4 We disagree with the assertion that the 'perception of a wind farm influenced seascape where offshore windfarms are a characteristic element, as they appear as elements that are repeated'. The only OWFs visible from the shoreline of the SCHAONB are the Greater Gabbard and Galloper arrays which form a small, discrete element in an otherwise 'vast and featureless seascape'. They are only visible from the southern portion of the AONB coastline and then as a distant object which straddles the far horizon. They are not prominent in seaward views and consequently do not have an adverse effect on the natural beauty of the designation.	The assessments of SCT06 in section 28.6 of this chapter and Appendix 28.3 have been updated to clarify the onshore visual influence of these windfarms in SCT06 have on the setting of the AONB. The effects assessment for SCT06 focuses on changes in offshore character as a result of new features that will be located within the SCT and how they change its pattern of elements. The effects of the construction and operation of the offshore infrastructure on the setting of the AONB and the onshore LCTs which define

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			its character are assessed in section 28.7 of this chapter and Appendix 28.4 .
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4</p> <p>Whilst we agree with the contention in the final sentence that there is 'currently sufficient space' within the SCT when taken as a whole to accommodate EA2 we note that the sentence contains no mention of where the viewer of these 'separate developments' is located. Figures 28 28b / 28c, 34b / 34c, 36c / 36d, 37b / 37c and 38 b /c clearly show how EA2 would appear when viewed in combination with Galloper, Greater Gabbard OWFs and the proposed EA1N scheme. In these instances the 'sufficient space' referred to is lacking as the effect portrayed in these figures shows these separate developments essentially merging to form a 'curtain' across the seaward horizon so presently themselves as an apparently single entity.</p>	<p>Agreement that there is sufficient space to accommodate the East Anglia TWO windfarm site within the SCT, when taken as a whole is welcomed.</p> <p>Embedded mitigation measures through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation of the 'curtaining' effect by reducing the lateral spread of East Anglia TWO windfarm site and provides more open sea separation between each separate offshore windfarm. This separation is illustrated in Figures 28.55a – 28.60b.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.6.3, Para 148 - 153, Table 28.8 App. 28.2, Section 28.2.4</p> <p>For para.153 please refer to our comments contained in point 14 above. We disagree with the final sentence for the reasons stated in our comments to para.152. We note that figure 28.15 only shows the western portion of SCT 06. The full extent of this SCT is show in the link below. http://www.suffolklandscape.org.uk/userfiles/pdfs/Seascape/Figure_14_5997</p>	<p>Figure 28.15 shows an enlarged scale and does not capture the full extent of the SCT, however the full extent of SCT is shown in Figure 28.10.</p>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p>_Assessment_V1_10_Issue_web.pdf</p> <p>NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.7.3, Para. 162 and 163 App. 28.3</p> <p>We note that the maintenance activities associated with the operational phase of the scheme have not been incorporated into the seascape assessment. (see Chapter 6 6.5.16.2 para. 240 p.63 – 64) for details of these. We ask that this is done.</p> <p>NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	Maintenance activities are included within the operational effects assessments in this chapter and Appendices 28.3-28.7 .
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.7.3, Para. 162 and 163 App. 28.3</p> <p>LCT 05 Coastal Dunes and Shingle Ridges (Areas C, D and E only)</p> <p>Natural England comments are as follows; Area C: we agree with the judgement of significant effects for the construction and operational phases of the scheme.</p> <p>NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	Agreement on judgement of significant effects on LCT05 (Area C) is welcomed.
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.7.3, Para. 162 and 163 App. 28.3</p> <p>LCT 05 Coastal Dunes and Shingle Ridges (Areas C, D and E only)</p> <p>Natural England comments are as follows; Area D: we agree with the judgement of significant effects for the construction and operational phases of the scheme.</p> <p>NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	Agreement on judgement of significant effects on LCT05 (Area D) is welcomed.

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Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.7.3, Para. 162 and 163 App. 28.3 LCT 05 Coastal Dunes and Shingle Ridges (Areas C, D and E only) Natural England comments are as follows; Area E: we provisionally agree with the judgement of no significant effects for the construction and operational phases of the scheme and will confirm our definitive advice for our Relevant Representation. Although the distance to the array from this LCT is over 40km we are concerned that the increase in horizontal spread has not been factored into the scale of change component of the assessment, which is currently considered to be low.</p> <p>NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	<p>Provisional agreement on judgement of significant effects on LCT05 (Area E) is welcomed.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.7.3, Para. 162 and 163 App. 28.3 We agree that the offshore winds farms already present in the seascape (Galloper, Greater Gabbard, London Array and Gunfleet Sands I, II and III) are prevalent in the baseline and would appear from the figures 28.40b / 28.40c to occupy approximately 30% of the available seascape horizon. The EA2 proposal would extend this horizontal spread by a further 17% meaning that 47% of the available seascape horizon would be occupied by wind turbines. Figures 28.41b and 28.41c generate similar percentage values. We advise therefore that this assessment is reconsidered based on these facts with the scale of change reclassified as either medium or medium-low. NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	<p>Assessments of magnitude of change on LCT05 Areas B, C and D were already assessed as medium or medium-low in the PEIR.</p> <p>Embedded mitigation measures through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter., which provides mitigation by reducing the lateral/horizontal spread of East Anglia TWO windfarm site, reducing the seascape horizon that would be occupied by wind turbines. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES)</p>

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			are presented in Figures 28.55a – 28.60b .
Natural England	26/03/2019 Section 42 Consultation Response	<p>App. 28.3 LCT 06 Coastal Levels (Areas B, C, D and E only) Natural England's comments are as follows; Area B: we disagree with the judgement of no significant effects for the construction and operational phases of the scheme. The contribution the sea makes to the coastal portion of this LCT has been underestimated in the assessment. A portion of this LCT extends down to the coast (at Sole Bay, to the north of Southwold) where long distance and panoramic views out to sea will be altered through the loss of the open seascape occupied by EA2. We advise therefore that the scale of the change should be 'medium' for these portions of the LCT and the judgement should be significant.</p> <p>NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	Further granularity/geographic detail has been added to assessment of LCT06 Coastal Levels Area B in section 28.7 of this chapter and Appendix 28.4 , with the coastal area at Sole Bay added and assessed as having medium magnitude of change and significant effects.
Natural England	26/03/2019 Section 42 Consultation Response	<p>App. 28.3 LCT 06 Coastal Levels Area C: we agree with the judgement of no significant effects for the construction and operational phases of the scheme.</p>	Agreement on judgement of no significant effects on LCT06 (Area C) is welcomed.
Natural England	26/03/2019 Section 42 Consultation Response	<p>App. 28.3 LCT 06 Coastal Levels Area D: we disagree with the judgement of no significant effects for the construction and operational phases of the scheme. The contribution the sea makes to the coastal portion of this LCT has been underestimated in the assessment. Although the beach and shoreline are not visible from this LCT long distance and panoramic views out to the seaward horizon are available and form a key component of the character of this area. Due in part to the height and mass of the turbines the EA2 scheme will be visible (as predicated by the ZTV model Figure 28.16 which indicates up to 60 blades tips will be</p>	Further granularity/geographic detail added to assessment of LCT06 Coastal Levels Area D in section 28.7 of this chapter and Appendix 28.4 , with the coastal portion/edges of LCT further defined and assessed as having medium magnitude of change and significant effects.

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		visible). We advise therefore that the scale of the change should be medium for these portions of the LCT and the judgement should be significant.	Low change on other inland areas of LCT retained.
Natural England	26/03/2019 Section 42 Consultation Response	App. 28.3 LCT 06 Coastal Levels Area E: we disagree with the judgement of no significant effects for the construction and operational phases of the scheme. The contribution the sea makes to the coastal portion of this LCT has been underestimated in the assessment. Although the beach and shoreline are not visible from this LCT long distance and panoramic views out to seaward horizon are available and form a key component of the character of this area, particularly in the vicinity of Sudbourne Marshes, Sudbourne Beach and Kings Marshes. Due in part to their height and mass the turbines of the EA2 will be visible (as predicated by the ZTV model Figure 28.16 which indicates up to 60 blades tips will be visible). We advise therefore that the scale of the change should be medium for these portions of the LCT and the judgement should be significant.	Further granularity/geographic detail has been added to assessment of LCT06 Coastal Levels Area E in section 28.7 of this chapter and Appendix 28.4 , with the Sudbourne Marshes /Beach/Kings Marshes area of LCT further defined and assessed as having medium magnitude of change and significant effects. Low change on other inland areas of LCT retained.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.7.3, Para. 164 to 167 App. 28.3 LCT 07 Estate Sandlands Area A: we agree with the judgement of significant effects for the construction and operational phases of the scheme NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.	Agreement on judgement of significant effects on LCT07 (Area A) is welcomed.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.7.3, Para. 164 to 167 App. 28.3 LCT 07 Estate Sandlands. Area B: we agree with the judgement of no significant effects for the construction and operational phases of the scheme. NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.	Agreement on judgement of no significant effects on LCT07 (Area B) is welcomed.

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Natural England	26/03/2019 Section 42 Consultation Response	<p>Section 28.7.3, Para. 164 to 167 App. 28.3 LCT 07 Estate Sandlands. Area C: we disagree with the judgement of no significant effects for the construction and operational phases of the scheme. Walberswick and Westleton: The contribution the sea makes to the coastal portion of this LCT has been underestimated in the assessment. Consequently the scale of the change should be medium for these portions of the LCT. As with Area A of this LCT 'long distance and panoramic views out to sea' will be altered through the loss of the open seascape occupied by EA2. For instance such views are available from sections of The Suffolk Coast Path located to the east of Dunwich Forest where the interviewing LCT (8 Open Coastal Fens) would form the foreground of such views. We advise therefore that the scale of the change should be medium for these portions of the LCT and the judgement should be significant. Dunwich Heath and Cliffs: the contribution the sea makes to the coastal portion of this LCT has been underestimated in the assessment. Consequently the scale of the change should be medium for these portions of the LCT. As with Area A of this LCT 'long distance and panoramic views out to sea' will be altered through the loss of the open seascape occupied by EA2 particularly in the vicinity of Dunwich Heath where a portion the LCT extends down to the beach; as it does in Area A. The increased elevation of the coastal portions of this LCT, at the Coastguard Cottages for instance, will allow for views out to sea which extend further thereby bringing more of EA2 array into the view. We advise therefore that the scale of the change should be medium for these portions of the LCT and the judgement should be significant.</p> <p>NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	<p>Further granularity/geographic detail has been added to assessment of LCT07 Estate Sandlands Area C in section 28.7 of this chapter and Appendix 28.4, with the localised area of the LCT at Dunwich Heath/Cliffs further defined and assessed as having medium magnitude of change and significant effects. Low change on area between Walberswick and Westleton retained.</p>
Natural England	26/03/2019	<p>Section 28.7.3, Para. 164 to 167 App. 28.3 LCT 07 Estate Sandlands.</p>	<p>Agreement on judgement of no significant effects on LCT07 (Area D) is welcomed.</p>

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	Section 42 Consultation Response	Area D: we agree with the judgement of no significant effects for the construction and operational phases of the scheme. NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.	
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.7.3, Para. 168 App 28.3 LCT 08 Open Coastal Fens (Areas 1, 2 and 3) Due to their contiguous nature the areas which comprise this LCT will be dealt with as one unit. Natural England's comments are as follows; Areas 1, 2 and 3: we disagree with the judgement of no significant effects for the construction and operational phases of the scheme. The contribution the sea makes to the coastal portion of this LCT has been underestimated in the assessment. Although the beach and shoreline are not visible from this LCT long distance and panoramic views out to far seaward horizon are available from some locations and form a key component of the character of this area (particularly in the vicinity of Cooperation and Oldtown Marshes). As acknowledge in 28.5 p.13 although 'views of the sea are restricted' they are not absent. The ZTV model Figure 28.16 indicates up to 60 blades tips will be visible from locations within this LCT. We advise therefore that the scale of the change should be medium for these portions of the LCT and the judgement should be significant. NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.	The sensitivity of LCT08 has been increased to medium-high in this chapter and Appendix 28.4 ; and the magnitude assessments for each area slightly, e.g. Area A to medium-low, but with the overall finding of not significant retained.
Natural England	26/03/2019 Section 42 Consultation Response	Section 28.7.3.2, para. 169 to 177 The role of the seascape setting of the AONB in shaping and maintaining the special qualities of the area is a vital consideration and component of the SLVIA and a key interest for Natural England. We therefore welcome this assessment for the evidence and clarity it provides and believe it will greatly assist the ExA. The judgements contained in the landscape, seascape and visual assessments underpin the assessment of the effect on the special qualities of the SCHAONB as they relate to the setting of the designation.	Agreement on the clarity provided by the AONB special qualities assessment is welcomed (Appendix 28.4). Assessment of relative wildness and tranquillity have been expanded in section 28.7 of this chapter and

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		<p>We accept the logic employed here, but advise that more attention is given to how certain special qualities, notably aspects of Relative Tranquillity and Relative Wildness, arise and are experienced by people in areas affected by the scheme. That will provide a better basis for judging the likely significance of effect on human receptors and therefore further aid the ExA.</p> <p>We note the detailed assessment in Appendix 28.3 p.32 to 38 and make reference to the information contained in this document below.</p>	<p>Appendix 28.4 to consider how these aspects could be affected by the construction and operation of the offshore infrastructure.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Table 28.9 Section 28.3 Section 28.2.2</p> <p>The SHC represents that part of the SCHAONB most likely to experience significant adverse effects arising from the EA2 scheme. Reference to the boundary of the SHC will therefore help the ExA to understand the extent of the geographic influence of the EA2.</p>	<p>Reference has been added to Suffolk Heritage Coast (see Figure 28.13) in section 28.7.3.2 of this chapter as representing the part of the AONB most likely to experience significant effects.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Table 28.9 Section 28.3 Section 28.2.2</p> <p>We note that the seascape setting of has not been explicitly included within the assessment for the Landscape Quality and Scenic Quality special qualities and is not referred to in assessing the Relative Wildness and Relative Tranquillity special qualities. The seascape setting of the SCHAONB is important attribute in defining these special qualities e.g. 'Big Suffolk skies and expansive views offshore emphasis a sense of openness and exposure...' (28.3 p.33) and should therefore be incorporated into this assessment.</p>	<p>Seascape setting of the AONB added to the baseline description of special qualities in section 28.7 of this chapter and Appendix 28.4. It should be noted that seascape setting is not a quality listed in the published Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators report (LDA 2016), but has been added to the SLVIA baseline based on s42 consultations.</p>
Natural England	26/03/2019	<p>Table 28.9 Section 28.3 Section 28.2.2</p> <p>Landscape Quality: we agree with the judgement of significant effects as set</p>	<p>Agreement on judgement of significant and not significant effects is welcomed.</p>

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	Section 42 Consultation Response	<p>out in 28.3 at p.37 and p.38 and also agree with the judgement of no significant effects for the inland areas of the Estate Sandlands LCT 07 within the AONB. We disagree with the judgement of no significant effects for LCT 06 Coastal Levels and LCT 08 Coastal Fens for the reasons we set out in points 17 and 19 above.</p> <p>we advise that there may be significant effects on LCT 20 Saltmarsh and Intertidal Flats (Orford Ness only) and LCT 29 Wooded Fen and request that an assessment is undertaken to determine if this is the case; for our reasoning please see point 9 above.</p>	<p>Further granularity/geographic detail has been added to AONB special quality assessments of LCT06, 07 and 08 in section 28.7 of this chapter and Appendix 28.4 to reflect earlier comments on these LCTs.</p> <p>Additional preliminary assessment included for LCT20 and LCT29, but scoped out of detailed assessments.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Table 28.9 Section 28.3 Section 28.2.2 Scenic Quality: we agree with the judgement of significant effects as set out. We disagree with the judgement of no significant effects for LCT 06 Coastal Levels and LCT 08 Coastal Fens for the reasons we set out in points 17 and 19 above.</p> <p>We advise that for the assessment of Scenic Quality the judgements reached in of the Visual Assessment are incorporated. This will fully inform this assessment and move it beyond an assessment based solely on landscape character by factoring in how the scheme may adversely affect people who visit the ANOB to enjoy the scenic quality afforded by the natural beauty of this designated landscape and it's seascape setting, the latter being an integral component of the area's special qualities.</p>	<p>Agreement on judgement of significant and not significant effects is welcomed.</p> <p>Further granularity/geographic detail has been added to AONB special quality assessments of LCT06, 07 and 08 in section 28.7 of this chapter and Appendix 28.4 to reflect earlier comments on these LCTs.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Table 28.9 Section 28.3 Section 28.2.2 Relative Wildness: We disagree with the judgement of no significant effects as set out. A number of coastal locations within the SCHANOB provide opportunities to experience relative wildness. These include Orford Ness,</p>	<p>Appendix 28.4 and section 28.7 of this chapter have an expanded baseline description of relative wildness aspects of</p>

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		<p>Minsmere and Dunwich Heath where the character of the landscape and views afforded out to sea and long the coast contribute to the 'significant areas of semi natural landscape and seascape notably along the coastline, offshore and within undeveloped estuaries where there is little evidence of apparent human activity.....'. (28.3 p. 33). Whilst we agree that the construction and operation of EA2 will not directly influence these features (as acknowledge below for the special quality Natural Heritage) it will alter people's perception of the wildness of the coast through the introduction of visible man-made features off-shore. Consequently the apparent wildness of the coastline will be adversely effected and quality of the experience currently afford eroded. Due to the increase in offshore lighting these effects will extent into the night time as well.</p>	<p>special qualities, with reference to seascape setting.</p> <p>It should be noted that seascape setting is not a quality listed in the Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators report (LDA 2016), but has been added to the SLVIA baseline based on s42 consultations.</p> <p>Significant effects on pockets of relative wildness added to the assessment e.g. coastal parts of Coastal Levels LCT06 and Estate Sandlands LCT07.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Table 28.9 Section 28.3 Section 28.2.2 Relative Tranquillity: We disagree with the judgement of no significant effects as set out seeing limited evidence in the reasoning to support this judgement at 28.3 p.37.</p> <p>Whilst we agree with the statement '(the) appearance of the EA2 windfarm site relates rationally to the sounds of the wind and exposure along the AONB coastline' we note that it is not the site of the EA2 which is under consideration but the windfarm itself. Relative Tranquillity is a product of a wide range of environmental attributes (both natural and man-made) found within a specific location. It is how these combine elements and are then sensed, mostly through seeing and hearing, by an individual which generates an experience of tranquillity. Generally places which have an absence of people, development and industrial features (particularly prominent vertical structures like pylons, chimneys and wind turbines) and the strong presence</p>	<p>Appendix 28.4 and section 28.7 of this chapter have an expanded baseline description of tranquillity aspects of special qualities, with reference to seascape setting.</p> <p>It should be noted that seascape setting is not a quality listed in the Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators report (LDA 2016), but has been added to the SLVIA baseline based on s42 consultations.</p>

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		<p>of natural and semi-natural features are most likely to foster a sense of tranquillity. It is for this reason that we fundamentally disagree with the statements ‘their relatively low speed and long distance offshore would ensure that they have negligible changes to the perceived calmness in the landscape’ (28.3 p.37). EA2 will introduce clearly visible man-made structures which incorporate a kinetic element into an otherwise apparently undeveloped seascape thereby eroding the potential for people to experience tranquillity in these locations.</p> <p>The coastal areas of the SOCAONB contain a number of locations with the opportunity to experience a sense of relative tranquillity which is well above that which is available elsewhere, both in the SCHAONB and the rest of the country. Generally these locations coincide with, but are not limited to, the areas of Relative Wildness referred to above. Other more discrete locations along the coast can also provide this experience.</p>	<p>Significant effects on pockets of relative tranquillity added to the assessment e.g. coastal parts of Coastal Levels LCT06 and Estate Sandlands LCT07.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Table 28.9 Section 28.3 Section 28.2.2 Natural Heritage: We agree with the judgement of no significant effects as set out.</p>	<p>Agreement on judgement of no significant effects on the natural heritage special qualities of the AONB is welcomed.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>Table 28.9 Section 28.3 Section 28.2.2 Cultural Heritage: Natural England offer no comments on this assessment although notes that the coast and seascape setting of the AONB have internationally significant cultural associations in respect of art and music which relate directly to the designations seascape setting.</p>	<p>Comments on cultural heritage special qualities of AONB are noted and assessed further in Chapter 24 Onshore Archaeology and Cultural Heritage.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>We note that the maintenance activities associated with the operational phase of the scheme have not been incorporated into the seascape assessment. (see Chapter 6 6.5.16.2 para. 240 p.63 – 64) for details of these. We ask that this be done.</p>	<p>Maintenance activities are included within the operational effects assessments in this chapter and Appendices 28.3-28.7.</p>

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Natural England	26/03/2019 Section 42 Consultation Response	<p>For all viewpoints (unless otherwise stated) Natural England restricts its comments to the following visual receptor groups:</p> <ul style="list-style-type: none"> - Beach users, - Walkers and cyclists, - People sitting and viewing from seafront benches, - People sitting / viewing from seafront benches. <p>In addition we request that the user group 'walkers and cyclists' incorporates all users in this group and is not restricted just to those using the Suffolk Coastal Path and the National Cycle Network but expanded to include all PROW.</p> <p>Natural England considers these groups to be the ones most associated with the statutory purpose of the SCHAONB in that they intentionally seek to enjoy the natural beauty of the AONB and are particularly drawn to extensive views along the coast and out to sea, and as 'receptors' are highly sensitive to any detractors from that sought experience. Hence the seascape setting of the AONB is integral to why and how people visit and value the Suffolk Coast and Heaths.</p>	Noted.
Natural England	26/03/2019 Section 42 Consultation Response	<p>Viewpoint 3 Covehithe: We agree with the judgement of significant effects as set out. We advise that an assessment is also needed for walkers using PROW.</p> <p>Viewpoint 4 Southwold: We agree with the judgement of significant effects as set out.</p> <p>Viewpoint 5 Gun Hill Southwold: We agree with the judgement of significant effects as set out.</p> <p>Viewpoint 6 Walberswick: We agree with the judgement of significant effects as set out.</p> <p>Viewpoint 7 Dunwich: We agree with the judgement of significant effects as set out and advise that an assessment is also needed for users of PROW.</p> <p>Viewpoint 8 Dunwich Heath and Beach: We agree with the judgement of significant effects as set out (to include visitors Dunwich Heath and Beach (including Coastguard Cottages)).</p> <p>Viewpoint 9 Minsmere Nature Reserve: We agree with the judgement of</p>	Agreement on judgements of significant visual effects as set out in PEIR is welcomed and taken into this chapter and Appendix 28.5.

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		significant effects as set out for the receptor groups 'visitors at the car park' and 'walkers using the coastal trail around the scrape'.	
Natural England	26/03/2019 Section 42 Consultation Response	Viewpoint 10 Sizewell: We disagree with the judgement of no significant effects as set out. In all other instances the sensitivity of 'beach users' is high; this includes at viewpoints 4, 5, A and D which are either urban or peri-urban in character. Natural England sees no justification in lowering the sensitivity of this group (and for the group 'walkers on the SCP') on the premise that the presence of Sizewell nuclear power station would reduce the expectations, and hence the sensitivity, of this group. It could be argued that the opportunity to experience an open undeveloped seascape, as an alternative to the nuclear power station, means that such views are valued more by receptor groups in this location.	<p>Sensitivity of beach users and walkers at Sizewell Beach (Viewpoint 10) has been increased to medium in this chapter and Appendix 28.5 (from medium-low in PEIR), however there is clear justification for receptors to be assessed as having a reduced sensitivity from this viewpoint, next to Sizewell Nuclear Power Station, compared to views from other locations (of high sensitivity) in the AONB.</p> <p>This is due the visual amenity that receptors experience at this particular location, which is highly influenced by the visible elements of Sizewell Nuclear Power Station, which includes the presence of the power station itself as well as offshore intake and outfall structures in the nearshore waters looking out to sea towards the East Anglia TWO windfarm site. The assessment presented in the ES remains, on balance, not significant.</p>

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Natural England	26/03/2019 Section 42 Consultation Response	Viewpoint 11 Coastal Path between Thorpeness and Sizewell: We agree with the judgement of significant effect as set out. Viewpoint 12 Thorpeness: We agree with the judgement of significant effects as set out. Viewpoint 13 Aldeburgh: We agree with the judgement of significant effects as set out.	Agreement on judgements of significant visual effects as set out in PEIR is welcomed and taken into this chapter and Appendix 28.5.
Natural England	26/03/2019 Section 42 Consultation Response	Viewpoint 15 Shingle Street: We provisionally agree with the judgement of no significant effects as set out and will seek to confirm this in our definitive advice in our Relevant Representation. Although the distance to the array from this LCT is over 40km we are concerned that the increase in horizontal spread has not been factored into the scale of change component of the assessment, which is currently considered to be low. We agree that the offshore winds farms already present in the seascape (Gallopier, Greater Gabbard, London Array and Gunfleet Sands I, II and III) are prevalent in the baseline and would appear from the figures 28.40 b and c to occupy approximately 30% of the available seascape horizon (approximately 180 degrees). The EA2 proposal would extend this horizontal spread by a further 17% meaning that 47% of the available seascape horizon would be occupied by wind turbines.	Provisional agreement on judgements of not significant visual effects as set out in PEIR is welcomed and taken into this chapter and Appendix 28.5. Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation by reducing the lateral/horizontal spread of East Anglia TWO windfarm site, reducing the seascape horizon that would be occupied by wind turbines. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b.

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Natural England	26/03/2019 Section 42 Consultation Response	Viewpoint 16 Bawdsey: We agree with the judgement of no significant effects as set out (to include visitors to Bawdsey Point). Viewpoint 18 Orford Ness: We agree with the judgement of significant effects as set out. NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.	Agreement on judgements of not significant visual effects from Viewpoint 16 (Bawdsey) and significant visual effects from Viewpoint 18 (Orford Ness) as set out in PEIR is welcomed and taken into this chapter and Appendix 28.5 .
Natural England	26/03/2019 Section 42 Consultation Response	28.8.3.5 para.205 and 208 and Table 28.12 p.86 – 87 App. 28.5 Comments on Visual Assessment – Suffolk Coastal Path Section 03 Kessingland to Reydon: We agree with the judgement of no significant effects as set out. Section 04 Southwold: We agree with the judgement of significant effects as set out. Section 05 Walberswick and Corporation Marshes: We disagree with the judgement of not significant effects as set out. See our comments at point 22 Viewpoint 6. Section 06 Dunwich Forest and Heath: We agree with the judgement of significant effects but disagree with the judgement of no significant effects as set out. See our comments at point 22 for Viewpoints 7 and 8. Section 07 Minsmere and Sizewell: We disagree with the judgement of no significant effects as set out. Figure 28.23a clearly shows that from a significant portion of the path within this section EA2 will be visible with the predicted number of blade tips being visible in the banding 51 to 60. The commentary on p.20 also stated that the development will be visible from 3.6km of this 6.1km section (59%). We disagree with the assertion on p.21 that the sensitivity and magnitude of change is reduced due to the presence of the Sizewell nuclear power station. See also our comments at point 22 Viewpoints 9 and 10. Section 08 Thorpeness: We agree with the judgement of significant effects as set out. Section 09 Aldeburgh to Boyton Marshes: We agree with the judgement of no significant effects as set out.	Agreement on judgements of not significant visual effects on Sections 03 and 09 of the Suffolk Coastal Path and provisional agreement of not significant visual effects on Sections 10 and 11 is welcomed and taken forward into this chapter and Appendix 28.5 . Agreement on judgements of significant visual effects on parts of Sections 04, 06, 08 is welcomed and taken forward into this chapter and Appendix 28.5 . Disagreements with judgements on significance of visual effects on Sections 05, 06, 07 have been reviewed. A short 1.9km stretch of Section 05 between Walberswick and Dunwich Forest has been re-assessed as significant.

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		<p>Section 10 Boyton Marshes and Ordford Beach: We provisionally agree with the judgement of no significant effects as set out. See our comments at point 22 for Viewpoint 15.</p> <p>Section 11 Shingle Street to Bawdsey: We provisionally agree with the judgement of no significant effects as set out. See our comments at point 22 for Viewpoint 15.</p> <p>We note the statement in the second sentence of para. 208 and welcome this for acknowledging the potential significant effect of sequential views of the same development whilst walking a linear route and note section 28.3 on p.32 of 28.5 we sets out to judge the significance of the effect on the SCP when taken considered in its entirety.</p> <p>We consider that for 6 of the 9 sections of the path located within the SCHAONB the effect of the EA2 scheme on users of the path will be significant. We reserve judgement on 2 other sections and will confirm our advice at the Relevant Representation stage following further site visits.</p> <p>These significant effects will adversely affect the visual amenity afforded in seaward views available from the SCP and will also adversely affect some of the special qualities of the AONB designation. This will also be counter to the purposes of the SHC namely to 'conserve protect and enhance the coast...' and 'to facilitate and enhance their enjoyment...by the public'.</p> <p>To better understand the effect on users of the SCP within the SCHAONB we request that an assessment for these sections, are undertaken as a whole in the ES. We therefore offer no comment at this time on the judgement of no significant effects as set out in para. 5 and in the associated table p.32 to 36. NB: in all instances please refer to our comments about visibility (point 2) and reversibility (point 6) above.</p>	<p>Section 06 is heavily wooded through Dunwich Forest with limited visibility. The effects remain not significant with the exception of the 1km stretch near the Coastguard Cottages, as assessed in the ES.</p> <p>In line with previous comments about the sensitivity of visual receptors at Viewpoint 10, the sensitivity of the stretch of the Suffolk Coastal Path that passes directly alongside Sizewell Nuclear Power Station has been assessed as having a reduced (medium) sensitivity than other sections of the Suffolk Coastal Path.</p>
Natural England	26/03/2019 Section 42 Consultation Response	<p>28.8.5.5 para. 206 p. 85 We note this paragraph and welcome the highlighting of the creation of the English Coastal Path noting that the alignment of this path will wherever possible closely follow the coast and will therefore not always follow the route of the Suffolk Coastal Path.</p>	<p>England Coastal Path proposals to incorporate the Suffolk Coastal Path will be finalised and published in autumn 2019 and the new access is expected to be ready in 2020. In the meantime, the</p>

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			SLVIA assesses effects on users of the Suffolk Coastal Path.
Natural England	26/03/2019 Section 42 Consultation Response	Natural England welcomes this assessment for the clarity it provides. We note that no mitigation measures have been proposed for cumulative effects of the EA2 and EA1N schemes when considered together. Considering the predicted significant adverse effects for the EA2 scheme alone and the further in-combination adverse significant cumulative effects predicted for the EA2 and EA1N schemes when considered together, Natural England requests that SPR proposes suitable mitigation measures. Noting the policy in NPS EN-1 which states 'the aim should be to avoid compromising the purposes of the designation and that projects should be designed sensitivity' and considering the in-combination effects of these two schemes Natural England requests that evidence is presented to demonstrate how this policy requirement has been addressed.	Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation of the 'curtaining' effect by reducing the lateral spread of East Anglia TWO windfarm site and provides more open sea separation between each separate offshore windfarm This separation is illustrated in visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) presented in Figures 28.55a – 28.60b .
Natural England	26/03/2019 Section 42 Consultation Response	Para. 234: Natural England agrees with the initial statements of this paragraph but we disagree with the concluding portion 'there is scope for the EA2 OWF to be accommodated in this location without unacceptable effects on seascape, landscape character and visual amenity'. The paragraph makes no mention of the SCHAONB or acknowledges and gives proper weight to the integral contribution the seascape setting makes to supporting this nationally designated landscape and enabling it to deliver its statutory purpose.	Conclusions in section 28.13 of this chapter have been expanded to contain a fuller narrative and reflect the judgements contained within the ES SLVIA. Assessments that explicitly sets out the likely effects on the AONB are

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			provided in this chapter and Appendix 28.4.
Natural England	26/03/2019 Section 42 Consultation Response	Para. 235: We disagree with the conclusion presented here. We see no evidence in the SLVIA of work to quantify the windfarm carrying capacity of SCT 06 i.e. how many turbines the SCT can accommodate before the dominant character of the SCT becomes the presence of OWF. Additionally as this SCT forms a significant part of the seascape setting of the SCHAONB and noting the NPS EN-1 (5.9.12 and 5.9.13) requirement for it to avoid 'comprising the purposes of the designation' we fail to understand the relevance of this paragraph.	Conclusions in section 28.13 of this chapter have been expanded to contain a fuller narrative and reflect the judgements contained within the ES SLVIA.
Natural England	26/03/2019 Section 42 Consultation Response	Para. 236: Our comments on the specific points listed are as follows: <ul style="list-style-type: none"> - Bullet point 1: Reference is made to separation distances from the coast, but not to the height of the proposed turbines (300m) as set out in the worst case realistic scenario. A reference to both is required. - Bullet point 2: We disagree with conclusion presented. The landward geographic extent of the significant effect, restricted to the immediate coastal edges, fails to mention that all these significant effects occur within a nationally designated landscape and covers a length of the coastline extending to approximately 37km; approximately 60% of the total coastline of the SCHAONB (Orford Ness to Covehithe). So although the adverse significant effects do not extend far inland they do extend for a considerable distance along the coast, all of which is a designa Bullet point 3: Assuming that the seascape referred to is that defined by SCT 06 we agree with this statement. - Bullet point 4: Assuming that the seascape referred to is that defined by SCT 06 we agree with this statement. - Bullet point 5: We disagree with this statement. The inference is that the presence of the Greater Gabbard and Galloper OWFs in the seascape setting of the SCHAONB sets a precedent for the granting of a DCO EA2. We refer to our earlier comments in respect of NPS EN-1 (5.9.12 and 5.9.13) as set out above. - Bullet point 6: We disagree with this statement and believe it to be flawed due to reasons provided in respect of the previous bullet points, above. 	Conclusions in section 28.13 of this chapter have been expanded to contain a fuller narrative and reflect the judgements contained within the ES SLVIA.

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		landscape and a defined Heritage Coast. The conclusion should acknowledge this aspect of the assessment.	
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Object to EA2 in relation to the significant effects predicted offshore by SPR on seascape, coastal landscapes, character and qualities of the Area of Outstanding Natural Beauty (AONB) and cumulatively with EA1N. The EA2 project will result in a significant change to the sea views from key viewpoints on the AONB coast with the horizon cluttered with turbines. An impact which will be continuously experienced along the coastline further exacerbated when viewed in combination with EA1N and other existing wind farm arrays. It is also recommended that the Councils express concerns in relation to the effects of EA1N on seascape, landscape and visual effects and objects in relation to the cumulative impacts with EA2.	Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation of the horizontal spread of turbines and the cumulative 'curtaining' effect with East Anglia ONE North, by reducing the lateral spread and results in reduced effects arising from East Anglia TWO windfarm site on seascape, coastal landscapes and views from the AONB. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	The approach to, and layout and scope of the assessments, appear to be robust covering systematically, and reflecting conversations with SPR to date	Feedback on the robust and systematic approach, layout and scope of SLVIA is welcomed.
Suffolk County Council / Suffolk	26/03/2019	The seascape landscape and AONB Special Qualities baselines are appropriately established.	Agreement that the seascape, landscape and AONB special qualities baseline are

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Coastal District Council	Section 42 Consultation Response		appropriately established is welcomed.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	SPR will need to ensure that the scope of the projects considered is reviewed further prior to submission of the applications later in 2019, given the emergence of new projects.	Greater Gabbard Extension and Galloper Extension are still at pre-scoping stage at present and therefore not considered in the assessment in line with Planning Inspectorate Advice Note 17 Cumulative Effects Assessment
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Although the scope of assessments is acceptable the Councils consider that further work is required in relation to the identification of significant effects. The Councils have particular concerns regarding the following: 1. The assessments do not give sufficient weight to the contribution the current uncluttered seascape makes to the condition and character of the coastal landscape and its visual amenity. 2. The assessments do not give sufficient weight to the contribution the current uncluttered seascape makes to the setting, character and special qualities of the AONB.	Agreement that the scope of assessments is acceptable is welcomed. The simple composition of sea views is referred to throughout the SLVIA (this chapter and Appendix 28.5). Further assessment has been added to Appendices 28.3, 28.4, 28.5 and this chapter to address comments on the contribution that the 'uncluttered' seascape makes to the landscape, visual amenity and AONB special qualities. Although the open horizons and simple composition of the seascape setting is acknowledges as being a valued element of the

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			<p>seascape setting of the AONB, the seascape setting/sea views are not entirely uncluttered, with numerous large vessels and clutter created by existing offshore wind turbines at Greater Gabbard and Galloper. The Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators report (LDA 2016) acknowledges this clutter <i>'Offshore wind turbines at Greater Gabbard, Galloper and the more distant London Array are visible from some stretches of the coastline. These create a cluttered horizon and, like the large scale elements onshore, also divide opinion'</i>.</p>
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Undue weight given to the effect on the baseline conditions of the existing Gabbard and Galloper arrays and the consequent impacts on the assigned magnitude of change and susceptibility of receptors.	As above.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	The undue and potentially inappropriate weight given to the effect on the baseline conditions of Sizewell A and B developments and the consequent impacts on the assigned magnitude of change and susceptibility of receptors.	Sizewell A and B clearly have an influence on the baseline conditions, particularly in the localised area of the AONB near Sizewell, but more widely the Nuclear Power Station is

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			<p>visible from the north along the coastline and has a pervasive and distinctive influence in the backdrop to parts of the AONB coastline. It is considered that the SLVIA applies appropriate weight to the influence of Sizewell A and B. There is clear justification for landscape and visual receptors in close proximity to Sizewell to be assessed as having a reduced (generally medium) sensitivity, just as there is justification for other locations with less developed/remote/wild character in the AONB to be considered of high sensitivity. The SLVIA recognises these differences in sensitivity of different locations within the AONB and assesses the magnitude of change arising from the proposed East Anglia TWO project in this context.</p>
<p>Suffolk County Council / Suffolk Coastal District Council</p>	<p>26/03/2019 Section 42 Consultation Response</p>	<p>The apparent lack of recognition of the impacts of the proposals on “wildness” as a special quality of the AONB.</p>	<p>Appendix 28.4 and section 28.7 of this chapter include an expanded baseline description of relative wildness aspects of special qualities, with reference to seascape setting. There are only 'pockets of relative wildness associated</p>

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			<p>with coast' as stated in Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators report (LDA 2016), 'in this largely farmed and settled landscape. Assessment of relative wildness have been expanded in Appendix 28.4 and section 28.7 of this chapter to consider how these aspects could be affected by the construction and operation of the offshore infrastructure. Significant effects on pockets of relative wildness associated with the coast added to the assessment e.g. coastal parts of Coastal Levels LCT06 and Estate Sandlands LCT07 within the AONB.</p>
<p>Suffolk County Council / Suffolk Coastal District Council</p>	<p>26/03/2019 Section 42 Consultation Response</p>	<p>The Councils continue to maintain serious concerns over the degree of visual impact that the proposed EA2 windfarm in particular, and in addition to and in combination with the coast-side elements of EA1N and also the Galloper array from certain viewpoints, will have on the character of the East Suffolk shore and its immediate seascape areas.</p>	<p>Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation of the horizontal spread of turbines and the cumulative 'curtaining' effect with East Anglia ONE North, by reducing the lateral spread</p>

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			and results in reduced effects arising from the East Anglia TWO windfarm site on seascape, coastal landscapes and views from the AONB. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	<p>The PEIRs for both EA1N and EA2 (234 and 235) state that the offshore areas affected by the windfarms would remain as 'seascape with windfarms', and would not be affected so much as to be regarded as a 'windfarm seascape'. The Councils accept that this may be the case for the prevailing seascape character areas, but cannot accept it with regard to the fundamental change to the horizon in sea views from key viewpoint locations in the AONB coast. The EA2 PEIR (151) correctly acknowledges that the changes to the character of the nearshore waters between Kessingland and Orford Ness are significant. However, the EA1N PEIR (153 & EA2 152) seems to contradict this conclusion by stating that the windfarms, both existing and presumably proposed, are not the defining characteristic of the Offshore Waters Seascape Character Type (SCT), and yet also states that windfarms are a key component of people's surroundings in the SCT. This comes across as not very helpful reasoning and potentially a distraction from the accepted significant changes to the SCT noted in the previous paragraphs of the PEIRs. It is suggested that there should be further discussion and agreed understanding on key judgments within the assessment, especially regarding the magnitude of change in the SCTs. The following paragraph in both documents argues that that landscape planning has already established and accepted landscape change from offshore windfarm development in this seascape.</p> <p>This statement can only be valid as far as the extent and visibility of current</p>	<p>Agreement that the offshore areas/seascape character (SCT06) would remain as a 'seascape with windfarms' is welcomed.</p> <p>Change to the horizon in sea views from key viewpoint locations in the AONB coast are assessed in Appendix 28.5 and summarised in section 28.8 of this chapter.</p> <p>Further reasoning to the agreed significant effect judgements on SCT 03: Nearshore Waters has been added to Appendix 28.3.</p> <p>The SLVIA points to the precedent of existing and consented offshore wind farm development in the Offshore Waters (SCT06) and notes</p>

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		consented development is concerned, and does not at all set a precedent for further development that in the case of EA1N and EA2 would lead to an almost continuous presence of turbines on the horizon from some key viewpoints. Further, the suggestion in the EA1N PEIR (142 & EA2 141) that further development pressure may change the baseline conditions of the assessment is purely speculative and cannot be regarded as a reliable assumption.	that the East Anglia TWO windfarm site fits with this established approach of 'accommodation' of offshore wind energy development in parts of the study area seascape. Narrative judgements on acceptability of effects have been expanded in the conclusions of section 28.13 of this chapter.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	The Councils note and agree with the concluding paragraph of both Chapter 28s that EA1N will have some significant seascape, landscape and visual effects, and EA2 will have significant seascape, landscape and visual effects on the character of some inshore seascape and coastal edge landscape at the local and regional scale. It is the fact that these areas are nationally designated landscapes (AONB) and form the Heritage Coast, much valued by local residents and visitors who have a key contribution in the local economy that give the Councils such cause for concern.	Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation of the horizontal spread of turbines and the cumulative 'curtaining' effect with East Anglia ONE North, by reducing the lateral spread and results in reduced effects arising from East Anglia TWO windfarm site on seascape, coastal landscapes and views from the AONB. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .

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Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Specifically in relation to EA2, significant impacts arising from the offshore elements have been identified as follows: a) On seascape b) On coastal landscapes c) The character and special qualities of the AONB specifically scenic quality and landscape quality d) Significant impacts on the users of the Suffolk/England coast path e) That non-significant impacts on users of the coast path may become significant for long distance walkers, but the distance threshold is not defined f) Significant cumulative effects with both EA1N and Sizewell C.	Significant effects are assessed in Appendices 28.3-28.7 and summarised in this chapter.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	At this stage values assigned to receptor sensitivity and magnitude of change need further detailed review by officers and this may increase the instance of effects being significant in addition to those already identified.	Further review of receptor sensitivity has been undertaken in response to detailed comments provided by Natural England (see above) and reflected in the sensitivity assessments and significance judgements in the SLVIA in this chapter and Appendices 28.3-28.7 .
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	The conclusions of the SLVIAs are not robust; although significant impacts on the AONB and the Suffolk Coast Path are identified as part of the assessments either alone or cumulatively, these are not carried through to, or recognised in, the conclusions of the chapters (28.8); also the significant impacts on the landscape seascape and visual amenity are not satisfactorily made clear in the conclusions.	Conclusions in section 28.13 of this chapter have been expanded to contain a fuller narrative and reflect the judgements contained within the ES SLVIA.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	The need to ensure an agreed definition of tranquillity for the purposes of the assessment of impacts on the character and special qualities of the AONB.	Appendix 28.4 and section 28.7 of this chapter include an expanded baseline description of tranquillity aspects of

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			<p>special qualities, with reference to seascape setting.</p> <p>There are only pockets of tranquillity associated with coast/areas with wildness attributes, 'in this largely farmed and settled landscape'. Assessment of effects on tranquillity have been expanded in Appendix 28.4 and section 28.7 of this chapter. Significant effects on pockets of tranquillity associated with the coast added to the assessment e.g. coastal parts of Coastal Levels LCT06 and Estate Sandlands LCT07 within the AONB.</p>
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	The requirement identified by SPR for further work in respect of the accumulation of non-significant impacts on users of the Suffolk Coast Path that over longer distances may become significant.	Section 28.3 of Appendix 28.6 considers effects on users of the Suffolk Coast Path walking longer distances that may become significant when experienced sequentially.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Definition of susceptibility of landscape receptors. It is notable that where distance appears to have been factored in when defining the susceptibility of landscape to the proposals, this leads to effective double counting and unreasonably downgrades the susceptibility of this landscape to medium when it should be high.	Further review of receptor sensitivity has been undertaken in response to detailed comments provided by Natural England (see above) and reflected in the sensitivity assessments and significance judgements in the

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			SLVIA in this chapter and Appendices 28.3-28.7.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Furthermore, whilst noting that Open Coastal Fens Landscape Character Type (LCT) have been assigned low susceptibility, yet viewpoint 6 which is cited in this regard illustrates the clear relationship between this landscape type and the sea and therefore a rating of medium to medium-high (depending on location within the landscape type) would seem to be more appropriate.	Open Coastal Fens LCT 08 changed to medium susceptibility and medium-high sensitivity in section 28.7 of this chapter and Appendix 28.4.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Definition of the susceptibility of visual receptors also needs to be reviewed systematically in the light of the undue weight given to existing windfarms and Sizewell A and B.	Further review of visual receptor sensitivity has been undertaken in response to detailed comments provided by Natural England (see above) and reflected in the sensitivity assessments and significance judgements in the SLVIA in this chapter and Appendix 28.5. Responses to weight of existing windfarms and Sizewell A and B provided above.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Clarification is required regarding the representation of other offshore structures, which appear to be present in photomontages but not the wireframes.	Offshore infrastructure including the indicative offshore substation platforms, indicative accommodation platform and offshore met mast are shown in the photomontages in Figures 28.25 - 28.54.

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Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	It is notable that percentage of the view is discussed in the SLVIAs and there is a need to clarify the basis on which this assessment is made.	The horizontal spread of the East Anglia TWO windfarm site is measured in degrees of the field of view, between the left and right most turbines of the visible array.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	In addition, the report prepared by Alison Farmer Associates for the Suffolk Coast and Heaths AONB Partnership and appended to their response will also be the basis of further technical discussions between the Councils and the applicant prior to the DCO submissions.	Noted.
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	Based on the information presented to date, and issues identified above, the Councils remain unconvinced that; a) The seascape and views from the shoreline will not become dominated by wind turbines, as the conclusion of the assessments contend. b) That the EA2 wind farm can be accommodated without “unacceptable effects on seascape, landscape character and visual amenity” as set out in the conclusion of the assessment. c) That the findings and conclusions of the SLVIAs are a fully robust basis on which to properly understand the full impacts of the projects	a) Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter. This provides mitigation of the horizontal spread of turbines, by reducing the lateral spread and results in reduced effects arising from East Anglia TWO windfarm site on seascape, coastal landscapes and views from the AONB. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .

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			<p>b). Conclusions on acceptability have been updated and expanded in the narrative conclusions in section 28.13 of this chapter.</p> <p>c). The robust and systematic approach, layout and scope of SLVIA is recognised by SCC/SCDC and there is widespread agreement on many of the significant and non-significant effects findings across the SLVIA, between SPR/SCC/SCDC/Natural England. The assessments in the SLVIA have been updated in light of s42 comments on specific landscape and visual receptors. Conclusions in section 28.13 of this chapter have been expanded to contain a fuller narrative and reflect the judgements contained within the ES SLVIA.</p>
Suffolk County Council / Suffolk Coastal District Council	26/03/2019 Section 42 Consultation Response	The Councils are of the view, based on the current proposals, that due to the sensitivity of the receptors and the fundamental change arising from the combined windfarms especially EA2, the harmful effects of EA2 are considered to outweigh the benefits. NPS EN-1 recognises the vulnerability of coastal areas to visual intrusion due to the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coastline. The cumulative impacts of both projects would have significant effects along almost the entirety of the east Suffolk	Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation of the horizontal

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		coastline. The effects predicted by SPR would be experienced permanently. It could be argued that 30 years is not permanent but with the option available to repower the turbines, the significant length of time will feel permanent to the Councils and local communities affected. The Councils therefore object to EA2 in relation to the significant effects predicted by SPR on seascape, coastal landscapes, character and qualities of the AONB and Heritage Coast, users of the Suffolk Coast Path and cumulatively with EA1N. The Councils express concerns in relation to the effects of EA1N on seascape, landscape and visual effects and object in relation to the cumulative offshore impacts with EA2.	spread of turbines and the cumulative 'curtaining' effect with East Anglia ONE North, by reducing the lateral spread and results in reduced effects arising from East Anglia TWO windfarm site on seascape, coastal landscapes and views from the AONB. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
National Trust	Section 42 Consultation Response	The proposal would include up to 75 wind turbines and it appears that there would be a greater concentration of wind turbines within the southern part of the red line boundary, closest to Orford Ness. The proposal would significantly impact upon the off-shore seascape at Dunwich and Orford Ness and would be visible from the Area of Outstanding Natural Beauty (AONB). The seascape forms part of the setting of the AONB.	Visual effects on receptors at Orford Ness and Dunwich are assessed in Appendix 28.5 and shown in the photomontages in Figures 28.32, 28.33 and 28.43 . Effects on the landscape character of the AONB assessed in Appendix 28.4 .
National Trust	Section 42 Consultation Response	The SLVIA states that the construction and operation of the offshore infrastructure would have significant effects on the seascape character of the area of nearshore waters between Kessingland and Orford Ness. The document acknowledges that the proposal will include elements on the sea skyline which will partially alter the visual relationship of the seascape with the coastline, resulting in partial loss of open sea skyline in the backdrop of offshore waters. The magnitude of change is described as 'medium' and the significance of effects during construction, operation and decommissioning are described as 'significant'. The National Trust is of the opinion that the turbines would interrupt the uncluttered seascape and create a focal point	The seascape setting of the AONB is not entirely uncluttered, with large vessels and existing wind turbines present, however the simple composition of sea views is referred to throughout the SLVIA (this chapter and Appendix 28.5).

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		within the off-shore views. These structures will be long term features within the seascape. The proposal will result in the loss of an open seascape, giving way to a cluttered horizon.	Significant effects are limited to the East Suffolk shore and its immediate seascape areas. Embedded mitigation measures through a revised East Anglia TWO windfarm site layout, are as described in section 28.3.3 of this chapter. This provides mitigation of the loss of open seascape, by reducing the lateral spread and results in reduced effects arising from the East Anglia TWO windfarm project. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
National Trust	Section 42 Consultation Response	The impact upon the AONB is also described as 'Significant', having an impact upon the landscape and scenic quality of the area and the seascape setting. This is also the case when considered cumulatively with the proposed East Anglia ONE North windfarm. The East Anglia TWO windfarm site will also be seen within the context of the existing Galloper and Greater Gabbard windfarms towards the south of the study area, in the Orford Ness area. The fact that other windfarms are already present does not make the addition of another one in this area acceptable. It would result in a greater accumulation of wind turbines over a longer stretch of coast and would have a greater visual impact.	The cumulative effects of the construction and operation of the offshore infrastructure with East Anglia ONE North and other offshore windfarms is assessed in Appendix 28.7 and summarised in section 28.9 of this chapter. The combined effect of Galloper and Greater Gabbard is greater on some of the southern and closest areas of the AONB between Orford

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			<p>Ness and Bawdsey, e.g. Viewpoint 18 (Figure 28.43b) where the vertical scale of the closer Greater Gabbard/Galloper turbines (from 25km) appears similar to East Anglia TWO, and occupies a wider lateral spread on the skyline.</p> <p>The SLVIA points to the precedent of existing and consented offshore wind farm development in the Offshore Waters (SCT06) and notes that the East Anglia TWO windfarm site fits with this established approach of 'accommodation' of offshore wind energy development in parts of the study area seascape. Narrative judgements on acceptability of effects have been expanded in the conclusions of section 28.13 of this chapter.</p>
National Trust	Section 42 Consultation Response	Table 28.10 (Viewpoints - Summary of Effects) describes the impact from the National Trust café as 'Not Significant'. There appears to be a discrepancy here as the National Trust café is listed under Viewpoint 7, yet Dunwich Heath and Beach (including Coastguard Cottages) are listed under Viewpoint 8 and described as having a 'Significant' effect. The National Trust café is located in the same building as the Coastguard Cottages. The Trust would argue that given the heavily visited area where the café is located (along with other visitor infrastructure including the car park, shop, toilets, picnic area)	The reference to National Trust café at Viewpoint 7 corrected in Table 28.9 of this chapter and Appendix 28.5 . There is a café at Dunwich Beach, to which the PEIR referred, but it is not the

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		and the fact that it sits at an elevated position from the surrounding beach and marshes, the impacts from this location would also be significant.	National Trust café (which is at Viewpoint 8). Views from the café at Viewpoint 7 are screened by intervening shingle beach/dunes, however effects experienced by visual receptors at the National Trust cafe at Dunwich Heath are assessed as significant as part of Viewpoint 8 assessment.
National Trust	Section 42 Consultation Response	It is noted that further technical assessment of the seascape impacts upon the Suffolk Coastal Path are required. The path has a medium to high sensitivity to change. However, findings so far indicate that one of the four sections which would be significantly affected would be a 1km stretch over Dunwich Heath, north of Coastguard Cottages. The National Trust is interested in the findings of further assessments on the Coastal Path and reserves comment at the current time. Furthermore, the England Coast Path will be a national trail, with associated national weighting in terms of sensitivity to landscape and visual impacts, so we would question the medium/high sensitivity to change for the path in this location.	Updates to the effects assessed on the Suffolk Coastal Path have been made in Appendix 28.6 , however there is substantial agreement with Natural England on the on judgements of significant and not significant visual effects on the different sections of the Suffolk Coastal Path. The effects remain significant on views experienced over a 1km stretch over Dunwich Heath near the Coastguard Cottages, as assessed in the Appendix 28.6 .
National Trust	Section 42 Consultation Response	The SLVIA has found that the construction and operation of the offshore infrastructure would not result in the key characteristics of significantly affected areas as being affected to such a degree that the seascape would become a 'windfarm seascape' (in addition to or with other operational windfarms), where wind turbines dominate the character, but that it would	Embedded mitigation measures for the northward spread/cumulative effect is through a revised East Anglia TWO windfarm site layout, as

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		remain characterised locally as a 'seascape with windfarms'. The National Trust does not agree with this conclusion. The seascape would become dominated by linear stretches of wind turbines which would undoubtedly change its character to a 'windfarm seascape'.	described in section 28.3.3 of this chapter, which provides mitigation of the horizontal spread of turbines and the 'curtaining' effect by reducing the lateral spread of East Anglia TWO windfarm site and provides more open sea separation between each separate offshore windfarm. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
National Trust	Section 42 Consultation Response	The Trust also has concerns about light pollution. Dunwich Heath has low levels of light pollution and benefits from dark skies. This enables the Trust to host 'Stargazing' events at the site. The documents state that night time lighting (red lighting) of the wind turbines will be required. This appears to be deemed acceptable to SPR as it would be viewed at long distance and in the context of existing wind turbine lighting (Galoper and Greater Gabbard) and other lighting of cardinal buoys and vessels in the waters off the AONB coastline. The National Trust is concerned about the lighting both as an individual development and in combination with other existing developments which would extend the magnitude. Lighting will have an impact on the night sky for the lifetime of the development. It is requested that a lighting strategy and night-time CGI and visualisations from Dunwich Heath and Orford Ness are included with any submission to enable assessment of this issue.	The night-time viewpoint photograph locations shown in the PEIR were agreed with the ETG, based on where people will actually be at night e.g. sea-fronts of key settlement receptors. They are sufficient to represent and understand the likely effects of aviation lighting in views from the coast. It is not clear why people would be at Orford Ness at night to experience a night time view, with very few receptors considered to be in that location at night.

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			The nearest night-time viewpoint to Dunwich Heath is at Southwold, with night-time visualisation provided in Figure 28.28g-h ; and the nearest to Orford Ness is at Aldeburgh (Figure 28.37f-g). These can be taken as a proxy to understand the likely effects of aviation at night-time on Dunwich Heath and Orford Ness.
National Trust	Section 42 Consultation Response	Whilst it is acknowledged that the turbines will be more visible when the weather allows good visibility, they will nonetheless be long term features within the seascape. The SLVIA concludes that the proposal would result in some significant effects on the character and views from the closest areas of the Suffolk coastline but that the windfarm site could be accommodated in this location without unacceptable effects on seascape, landscape character and visual amenity. The Trust disagrees with this and considers that the windfarm would have a significant adverse impact upon seascape including views from Dunwich Heath and Beach, Orford Ness, parts of the Suffolk Coastal Path (and England Coast Path) and the setting of the AONB.	Conclusions on acceptability have been updated and expanded in the narrative conclusions in section 28.13 of this chapter.
National Trust	Section 42 Consultation Response	Given that SPR consider that the proposal would not have an unacceptable effect (despite having a significant effect) it appears that the 'Mitigation Hierarchy' (avoid, mitigate, compensate) has not been applied. The National Trust considers that it would not be possible to mitigate the off-shore visual impact of the development. Accordingly, compensation should be provided through an AONB fund which should be secured through a legal agreement to enable landowners to carry out improvements which would enhance the landscape and setting of the AONB on-shore and on land within their ownership to compensate for the off-shore impacts	Embedded mitigation measures for the northward spread/effective is through a revised East Anglia TWO windfarm site layout, as described in section 28.3.3 of this chapter, which provides mitigation of the horizontal spread of turbines and the 'curtaining' effect by reducing

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			the lateral spread of East Anglia TWO windfarm site and provides more open sea separation between each separate offshore windfarm. Visualisations showing this mitigation (the difference between the East Anglia TWO windfarm site PEIR and ES) are presented in Figures 28.55a – 28.60b .
National Trust	Section 42 Consultation Response	<p>The National Trust is concerned about the cumulative impact of East Anglia TWO in combination with other planned major infrastructure on the Suffolk Coast. This includes on-shore and off-shore development.</p> <p>Of particular concern are the existing and proposed East Anglia Offshore Wind Arrays, the proposed nuclear power station at Sizewell C and two interconnectors to Belgium and the Netherlands by National Grid Ventures. This is in addition to Sizewell A, Sizewell B and the Galloper and Greater Gabbard off-shore windfarms which already exist.</p> <p>The Trust has the following concerns and requests that these are covered in SPR's assessment:</p> <p>Any overlap in construction programmes which could impact upon visual amenity, landscape character and the tourist economy;</p>	<p>Cumulative Effects of the proposed East Anglia ONE North and East Anglia TWO projects with the Sizewell C Project are assessed in Appendix 28.7 and summarised in section 28.9 of this chapter. Sizewell A and B, Galloper and Gabbard substations form part of the baseline. It was agreed with the ETG that there is insufficient information to assess NG Ventures (Nautilus & Eurolink).</p>
National Trust	Section 42 Consultation Response	<p>The National Trust is concerned about the cumulative impact of East Anglia TWO in combination with other planned major infrastructure on the Suffolk Coast. This includes on-shore and off-shore development.</p> <p>Of particular concern are the existing and proposed East Anglia Offshore Wind Arrays, the proposed nuclear power station at Sizewell C and two interconnectors to Belgium and the Netherlands by National Grid Ventures.</p>	<p>Cumulative Effects of the proposed East Anglia ONE North and East Anglia TWO projects with the Sizewell C Project are assessed in Appendix 28.7 and</p>

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		<p>This is in addition to Sizewell A, Sizewell B and the Galloper and Greater Gabbard off-shore windfarms which already exist.</p> <p>The Trust has the following concerns and requests that these are covered in SPR's assessment:</p> <p>Seascape impacts upon the character of the area, views from Dunwich Heath and beach, Orford Ness, the AONB and its setting, the Heritage Coast, the coastal path and public rights of way;</p>	<p>summarised in section 28.9 of this chapter. Sizewell A and B, Galloper and Gabbard substations form part of the baseline.</p> <p>It was agreed with the ETG that there is insufficient information to assess NG Ventures (Nautilus & Eurolink). This is in line with Planning Inspectorate Advice Note 17 Cumulative Effects Assessment.</p>