



**SCOTTISHPOWER  
RENEWABLES**

# **East Anglia TWO Offshore Windfarm**

## **Applicant's Comments on Natural England's Deadline 3 Submissions (Area of Outstanding Natural Beauty)**

Applicant: East Anglia TWO Limited  
Document Reference: ExA.AS-2.D5.V1  
SPR Reference: EA2-DWF-ENV-REP-IBR-001217

Date: 3<sup>rd</sup> February 2021  
Revision: Version 01  
Author: Royal HaskoningDHV

**Applicable to  
East Anglia TWO**



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
001	03/02/2021	Brian Denney, Gideon Amos	Ian MacKay/ Lesley Jamieson	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
001	n/a	n/a	Final for submission at Deadline 5



# Table of Contents

<b>1</b>	<b>Executive summary</b>	<b>1</b>
<b>2</b>	<b>Introduction</b>	<b>5</b>
<b>3</b>	<b>Response to key statements</b>	<b>7</b>
<b>4</b>	<b>SLVIA Significance/magnitude of effect</b>	<b>11</b>
<b>5</b>	<b>Geographical extent of significant effects</b>	<b>16</b>
<b>6</b>	<b>The future character of the SCHAONB</b>	<b>20</b>
<b>7</b>	<b>Comparisons with other Offshore wind farms</b>	<b>22</b>
7.1	Navitus Bay	22
7.2	Rampion Offshore Wind Farm	23
7.3	Sizewell C - Girling vs East Suffolk Council	23
7.4	East Heslerton, North York Moors	24
<b>8</b>	<b>Conclusions and recommendations</b>	<b>25</b>
<b>Appendix 1 - Geographic extent of significant effects on AONB special qualities</b>		<b>1</b>



## Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
NPS	National Policy Statement
Km	Kilometre
m	Metre
APP	Application Document
PD	Procedural Decision
ExA	Examining Authority
DCO	Development Consent Order
NE	Natural England
RR	Relevant Representation
EA2	East Anglia TWO
EA1N	East Anglia ONE North
CroW	Countryside and Rights of Way Act 2000
NSIP	Nationally Significant Infrastructure Project
LIR	Local Impact Report
PEIR	Preliminary Environmental Impact Report
ES	Environmental Statement
SDNP	South Downs National Park
EIA	Environmental Impact Report
SPP	Scottish Planning Policy
LCT	Landscape Character Type
HDD	Horizontal Directional Drilling
CCS	Construction Consolidation Site
LVIA	Landscape and Visual Impact Assessment
SSSI	Site of Special Scientific Interest
SAC	Special Area of Conservation
SPA	Special Protected Area
OLEMS	Outline Landscape and Ecological Management Plan
SCHAONB	Suffolk Coast and Heath Area of Outstanding Natural Beauty



## Glossary of Terminology

Applicant	East Anglia TWO Limited
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one 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.



# 1 Executive summary

1. Following extensive correspondence between east Anglia TWO Limited (The Applicant) and Natural England (NE) over the last eighteen months, many issues have been agreed. However, it remains that there are some matters which relate to the evidence contained in the Seascape, Landscape and Visual Impact Assessment (SLVIA) chapter of the ES for the East Anglia TWO Offshore Windfarm (the Project), which are not agreed. This document sets out and responds to key points which are raised by NE within their Deadline 3 comments (REP3-120) to the Examining Authority (ExA).
2. The Applicant has provided previous responses to NE's comments in relation to the potential effects upon the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (SCHAONB). The Deadline 3 comments (REP3-120) from NE focus upon the following four areas of detail to which this note provides clarification, based upon evidence within the application documents:
  - *SLVIA significance of effect vis magnitude of change;*
  - *Geographical extent of the significant adverse effects on the special qualities of the SCHAONB;*
  - *The future character of the SCHAONB; and*
  - *The proximity of the array to the coast and comparisons with other offshore windfarms (OWFs)*
3. As set out in the Applicant's clarification note on effects on the AONB (***Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths AONB and Accordance with NPS Policy***, REP2-008) paragraphs 5.9.12 and 13 of NPS EN1 set a clear test for "Developments outside nationally designated areas which might affect them". NE in their response refer to this test and so its relevance seems to be agreed. However, NE, whilst stating it would not be "appropriate" to comment upon matters of interpretation of policy, also suggest the test for developments within an AONB should be interpreted as applying to the windfarm site 32km outside of the AONB. NE also posit a number of other policies as being the key policy test (eg. whether there would be effects on the AONB statutory purposes and "that EA1<sup>1</sup>/EA2 [should] conserve the natural beauty of the AONB"). However, the key NPS policy test for the wind farm development outside of an AONB is self-evidently the one set out in paragraphs

---

<sup>1</sup> It is assumed that mention of EA1 by NE here is a typographical error and that NE does not intend to extend its objection on grounds of offshore wind farm impacts on the AONB to EA1N.



5.9.12 and 13 of NPS EN1 and the Applicant suggests that interested parties being clear and consistent on the key test to be applied would be helpful.

4. NE's confirmation that "significant adverse effects of the scheme have been lessened through a reduction in the lateral spread of the array and clarification on the height of the machines to be used" is welcomed. NPS EN1 paragraph 5.9.10 on the extent to which landscape effects are "moderated" and paragraph 5.9.12 on designing "sensitively given the various siting, operational, and other relevant constraints", both demonstrate the relevance of this lessening of effect. It is disappointing therefore that this finding appears to be contradicted in the rest of the NE response which does not take its own finding of lessening of effect into account. The material reduction in lateral spread of the wind farm and turbine height is relevant to, and directly addresses, the key tests in NPS EN1 paragraphs 5.9.12 and 13 and therefore should be accorded appropriate weight in the examination and decision-making process.
5. This response has addressed the four key areas as follows:

*SLVIA significance of effect vis magnitude of change*

6. NE have set out at paragraphs 9,10 and 11 of **Appendix E3** (REP3-120), their concerns regarding the matter of Significance and matters relating to the nature and frequency of the effects as set out in REP2-008. The Applicant sets out that the clear findings of the SLVIA have been reported, and within which it is recognised that the evaluation of significance is a complex and often subjective process. What REP2-008 sought to make clear therefore is the Nature of the Effect, to assist in the understanding of an identified significant effect and to provide appropriate context, to better aid an understanding of its effect on the experience of the SCHAONB. The matter of weather and visibility is also an important matter to consider in understanding the likelihood of significant effects upon the special qualities of the SCHAONB. As noted by NE, the SLVIA, is based upon a worst-case of 'very good' or 'excellent' visibility. However, as described at paragraph 107 of the **SLVIA methodology** (Appendix 28.2 (APP-560)) "**effects that are assessed to be significant may be not-significant under different, less clear conditions**". Therefore, for the greater part of the time the clarity of long-distance views out to sea will not be part of the experience of those enjoying the coast. This needs to be taken into consideration alongside the nature of the effects (magnitude) and the effects subsequently being on the threshold of significance, alongside the geographical extent over which they are likely to be experienced.

*Geographical extent of the significant adverse effects on the special qualities of the SCHAONB*



7. It is agreed by the Applicant and NE that the AONB as a whole is not affected. It is recognised by the Applicant that it remains to be judged as to whether significant effects on some of the Special Qualities in part of the AONB, amount to sufficient harm to compromise the purposes of designation. In making this judgement, both the matters concerning the nature and frequency of the identified significant effects, and the geographical extent over which they might be experienced, needs to be understood and taken into consideration.
8. Where significant effects to special qualities occur, the judgement of significance is finely balanced and near to the threshold of significance. The assessment and professional judgement took a precautionary approach. For NE's position to be sustained, it would be necessary to conclude that the significant effects on some of the Special Quality Indicators and Special Qualities expressed along the coast, were both fundamental to the purposes for designation and affected to a sufficient degree, that the identified significant effects compromised those purposes. In reaching this conclusion it would need to be determined that these significant effects represented a level of change that the AONB was not sufficiently resilient to accommodate. The Applicant, drawing upon the detailed assessments that have been undertaken, does not consider that this threshold has been reached.

*The future character of the SCHAONB*

9. With regard to the future character of the SCHAONB, the AONB Management Plan recognises the role energy developments will play along this coast, and that development may cause significant effects yet to pass the National Policy tests, where it states that **“This part of Suffolk is promoted as the ‘Energy Coast’ by the local authorities, reflecting the nuclear power complex at Sizewell and offshore wind farms and the associated infrastructure”** (SCHAONB-Management-Plan-2018 to 2023 – page 8). What REP2-008 sought to do, was to provide suitable context concerning the AONB and this was done, not in speculation, but with reference to the AONB management plan and the Special Qualities Indicator document.

*The proximity of the array to the coast and comparisons with other OWFs*

10. With the exception of Rampion Offshore Wind Farm and Sizewell C Nuclear Power Station, examples cited by NE are not examples of “permitted infrastructure” which NPS EN1 suggests can be put forward and are projects located in relation to entirely different designations and/or policy regimes. However, the Applicant agrees with NE that both Rampion and, since it has been raised by NE, Sizewell C are relevant examples of “permitted infrastructure” with much greater landscape effects. Sizewell C enabling works including 30ha of development actually within the SCHAONB have been permitted (a decision





---

upheld by the High Court<sup>2</sup>) sitting alongside Sizewell B, also permitted within the AONB<sup>3</sup>. Both the Rampion and Sizewell examples have greater landscape effects than the proposed EA2 wind farm, rather than “similar” landscape effects to EA2. .

---

<sup>2</sup> *Girling v East Suffolk Council* [2020] EWHC 2579  
<https://www.bailii.org/ew/cases/EWHC/Admin/2020/2579.html>

<sup>3</sup> Sizewell Nuclear Power Station sits in the SCHAONB and was consented despite the Inspector's description that “The Sizewell site is within the Suffolk Heritage Coast and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty....The development of Sizewell B would be a massive intrusion into the area [with] massive” landscape impacts.  
<https://api.parliament.uk/historic-hansard/lords/1987/mar/02/sizewell-power-station-inquiry-report>



## 2 Introduction

11. This response has been prepared on behalf of East Anglia TWO Limited (the Applicant) to Appendix E3 to the Natural England Deadline 3 Submission Natural England's Comments to Effects regarding the SCHAONB and Accordance with NPS Policy [REP2-008] (REP3-120) within which Natural England (NE) commented upon the Applicant's Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy' (REP2-008) clarification note.
12. These matters relate solely to the East Anglia TWO application and are therefore denoted with a blue icon in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004).
13. It is not the intention that this response comprises an extensive rebuttal, but addresses key points raised. It is only where NE make a direct point, observation, or criticism that the Applicant considers further clarification to be appropriate to enable the full understanding of the potential effects of the East Anglia TWO project (the Project) upon the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (SCHAONB). These will be addressed by reference to the NE report and where appropriate, cross reference made to the Applicant's earlier report Applicant's Comments on Relevant Representations Natural England (AS-036) and the Applicant's Comments to Natural England's Deadline 1 Submissions (REP2-004). Where appropriate reference is also made to the Seascape, Landscape and Visual Amenity material prepared as part of the Application documents and relevant publications dealing with specific points of methodology.
14. Within their detailed comments, in addition to matters of interpretation of planning policy, NE refer to additional evidence provided by the Applicant with focus placed upon the following four key areas:
  - *SLVIA significance of effect vis magnitude of change;*
  - *Geographical extent of the significant adverse effects on the special qualities of the SCHAONB;*
  - *The future character of the SCHAONB; and*
  - *The proximity of the array to the coast and comparisons with other offshore windfarms (OWFs).*



15. This response initially sets out the Applicant's consideration of the NE report relating to planning/policy and any other overarching matters and subsequently addressing the four key areas above.



### 3 Response to key statements

16. As set out in REP2-008 paragraphs 5.9.12 and 13 of NPS EN1 set a clear test for “Developments outside nationally designated areas which might affect them”:

*5.9.12 The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation<sup>4</sup> and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on National Scenic Areas in Scotland.*

*5.9.13 The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent.*

17. NPS EN3 provides further policy commentary:

*2.6.208 Where a proposed offshore wind farm is within sight of the coast, there may be adverse effects. The IPC should not refuse to grant consent for a development solely on the ground of an adverse effect on the seascape or visual amenity unless:*

- it considers that an alternative layout within the identified site could be reasonably proposed which would minimise any harm, taking into account other constraints that the Applicant has faced such as ecological effects, while maintaining safety or economic viability of the application;*
- or*
- taking account of the sensitivity of the receptor(s) as set out in EN-1 paragraph 5.9.18, the harmful effects are considered to outweigh the benefits of the proposed scheme.*

*2.6.209 Where adverse effects are anticipated either during the construction or operational phases, in coming to a judgement, the IPC should take into account the extent to which the effects are temporary or reversible.*

18. The Applicant fully respects the fact that “the meaning of a planning policy [in contrast to the meaning of a statute or planning permission] is a matter for the decision maker in the case”<sup>5</sup> and agrees with NE that “it is for the ExA to interpret and apply national planning policy and to weigh all of the evidence presented,

<sup>4</sup> It should be noted that the policy test on any compromising of the purposes of designation is not written in absolutist terms.. Whilst the EA2 Project does not come near to compromising the purposes of designation, it is relevant as a matter of background, that the policy states this should be the “aim”, rather than being an absolute requirement.

<sup>5</sup> Virgin Cinema Properties Limited v Secretary of State [1998] PLR 24



guided by national planning policy, to reach a balanced planning decision and recommendation to the Secretary of State” (REP3-120, paragraph 4).

19. Policy should be interpreted objectively and in accordance with the language used<sup>6</sup>. The Applicant on this basis set out its understanding that “compromising the purposes of designation” is a high level and broad test and similar to the Scottish Planning Policy approach of not compromising the “overall integrity” of the designated landscape. The Applicant strongly rejects the assertion of NE that in doing so the Applicant is being “misleading”.
20. In the same way that Inspectors and Secretaries of State consider a wide range of policies to be important and relevant whether or not they are referred to in the Planning Act 2008, similarly the ExA and the Secretary of State may consider the example of the Scottish approach, given it relates to the specific matter in hand, useful. Furthermore, the policy set out in Paragraph 5.9.12 is also applicable to the consideration of Scottish National Scenic areas. A designation which is also underpinned by the concept of special qualities. Even if the Scottish policy is not considered as a useful comparator, it remains clear that compromising the purposes of the original designation of the AONB is a very high bar and it cannot follow that particular effects on special qualities or the purpose of designation, would automatically constitute “a significant adverse effect on the statutory purpose of the AONB” or unacceptably “compromising the purposes of designation”, as suggested by NE (paragraph 22). If it did so, virtually no development in proximity to any AONB could ever pass such a test. Instead, the plain English meaning of the NPS EN1 policy test is that compromising of the purposes of designation would have to call into question that designation, and it is clear that the EA2 Project does not do so.
21. The Applicant similarly does not accept that the question of “whether the AONB is affected in ‘overall terms’,” is simply “immaterial” as stated by NE (NE paragraph 14).
22. It is also clear that the test of compromising the purposes of designation is not the same as, nor is it equivalent to, other tests suggested by NE as set out below.
  - I. *Whether the project would “conserve the natural beauty of the AONB” (NE Annex 1, 1.a.ii.)*
23. The Applicant considers that this is a matter to which the decision maker will have regard. It is not the relevant NPS policy test.

---

<sup>6</sup> R (Raissi) v SoS for the Home Department [2008] QB836



II. *Whether “significant adverse effects on the special qualities of the Suffolk Coast and Heath Area of Outstanding Natural Beauty will occur” (NE para 22)*

24. The Applicant considers that this is not the key policy test in NPS EN1. Nor can the general statement be made that effects on special qualities of this kind, will, “if previous inspector’s recommendations are followed, have a significant adverse effect on the statutory purpose of the AONB” be taken into account as no Inspector decision is identified, and in any event most Inspector decisions are not made under the Planning Act 2008 or under NPS EN1, which both apply in this case. Even if there were “effects” on the statutory purposes, this again is not the test in paragraphs 5.9.12 and 13 of NPS EN1 that applies in this matter.

III. *Whether “the AONB’s beauty takes priority” in the planning balance and whether “This undermines the Report’s argument that a “balance” should be struck” (NE Annex 1.2.a.)*

25. The Applicant considers that the whole of 2a of the Annex completely misapplies policy (in NPS EN1 paragraph 5.9.9) on development within AONBs to a development 32.6km outside of it and is therefore not both important and relevant to the decision.
26. The Applicant considers that it is equally important to take into account the other portion of paragraph 5.9.12, that projects should be designed “sensitively”, and further considers that the significant changes made to the spread of the windfarm site and to the height of turbines (see REP1-039) as well as through the original siting decisions to locate the windfarm site 32.6km away from the AONB, are all evidence of sensitive design with regard to the AONB and other environmental factors.
27. The Applicant agrees with NE that NPS EN3 paragraph 2.6.208 “still mandates a weighing up of projects’ ‘harmful effects’ vs ‘benefits’.” It is notable that like the equivalent policy in EN1, policy in EN3 is also permissive in wording and states that the decision maker “should take into account the extent to which the effects are temporary or reversible”. The Project is, albeit long term, both temporary and reversible.
28. The Applicant considers that being clear and consistent on the key tests to be applied would be helpful and that the relevance of NPS EN1 paragraphs 5.9.12 and 13 (and EN3 paragraphs 2.6.208 and 9) to any effects of an offshore windfarm on the SCHAONB are self-evident.
29. NE’s confirmation that “*significant adverse effects of the scheme have been lessened through a reduction in the lateral spread of the array and clarification on the height of the machines to be used*” is welcomed. NPS EN1 paragraph 5.9.10 on the extent to which landscape effects are “moderated” and paragraph



5.9.12 on designing “sensitively given the various siting, operational, and other relevant constraints”, both of which demonstrate the relevance of this lessening of effect. It is disappointing therefore that this finding appears to be contradicted in the rest of the NE response which does not take its own finding of lessening of effect into account. The material reduction in lateral spread of the windfarm site is relevant to, and directly addresses, the key tests in NPS EN1 paragraphs 5.9.12 and 13 and therefore should be accorded appropriate weight in the examination and decision-making process.

30. The Applicant notes and welcomes NE’s clear statement that “*Natural England and the Applicant agree that the extent of the significant adverse effects on some special qualities is geographically limited to the coastal edge of the SCHAONB. Consequently the AONB as a whole is not directly and adversely effected in ‘overall terms’.*” (NE paragraph 12).
31. NE state “speculation about future projects is simply not relevant”. However, the presence of “developing” energy projects is part of the Special Qualities of the AONB, and is the word used in the special qualities document. References to “developing” infrastructure demonstrates this future characteristic of the AONB is part of its Special Qualities.



## 4 SLVIA Significance/magnitude of effect

32. In REP3-120, NE have set out in their paragraphs 9,10 and 11 their concerns regarding the matter of Significance and matters relating to the nature and frequency of the effects as set out in REP2-008. They consider that the reference to the nature of the effect, (their magnitude), is a distraction from the judgement that these effects are assessed as Significant in the SLVIA. The Applicant does not intend in any way to set aside the clear findings of the SLVIA in this regard, but to place them into an appropriate context, relevant to their consideration in the planning balance and in relation to the relevant policy tests. Significance is a judgment made in an EIA context. Not all significant effects are of the same weight in considering them in a policy analysis. It is not the case, as stated by NE, that frequent reference is made to the magnitude of residual effects being (sic) Moderate (Medium). It is not until paragraph 90 of REP2-008 that it is stated that the effects were of medium magnitude, with a further brief reference to magnitude at paragraph 97 of the document. NE's concerns are therefore somewhat over-stated in this regard, although it is accepted that REP2-008 does seek to place the identified Significant effects into an appropriate context. This has been done to aid the decision-making process and this is made clear in paragraph 97 of REP2-008. This response report sets out at its Appendix 1, a summary of the findings of the assessments concerning the potential effects on the SCHAONB and its special qualities, in regard to both the geographical extent and the nature of the effects to make clear the matters that were raised in the Applicant's REP2-008 and that have subsequently been questioned by NE.
33. EIA Significance terminology is often misunderstood and has also changed over time. This can lead to interpretation problems. NE for example, refer to Moderate magnitude, whilst the SLVIA uses the term Medium. It is as an indicator of the level of Significance that Moderate is most often used (as distinct from magnitude), and for example effects may be reported as Moderate, Moderate Major or Major, and Significant. In this SLVIA, the magnitude is combined with sensitivity to judge whether the effect is judged to be Significant or not, without setting out a degree of effect. In **The State of EIA in the UK (IEMA 2011)**, it is recognised that the evaluation of significance is a complex and often subjective process and IEMA, to aid better communication, promotes the use of Nature of Receptor to replace Sensitivity and Nature of Effect to replace Magnitude. IEMA go on to give the following guidance:

***“Effective EIA practice ensures that the methods used can be readily understood by those reading the ES. EIA does not tend to***





***discuss significance in absolute terms. Instead, the assessment's findings are regularly set out as different levels of significance (e.g. major, moderate, minor, etc)."***

***"This approach is considered good practice; whilst recognising the inherent subjectivity of the assessment, it attempts to aid communication of the scale of the impact by introducing a classification."***

34. It is clear from the guidance of IEMA that the nature and degree of a significant effect is relevant in understanding the scale of the impact. In the SLVIA, levels or degrees of significance are not set out, although the methodology does reproduce a table that allows this process to be seen by the reader. What the REP2-008 has sought to make clear therefore is the Nature of the Effect, to assist in the understanding of an identified significant effect and to provide appropriate context, to better aid an understanding of its effect on the experience of the AONB. The Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA 3) (Landscape Institute with IEMA (2013)), states at its paragraph 3.35 (page 41) as follows:

***"In reporting on the significance of the identified effects the main aim should be to draw out the key issues and ensure that the significance of the effects and the scope for reducing any negative adverse effects are properly understood by the public and the competent authority before it makes its decision. This requires clear and accessible explanations."***

35. The paragraph quoted above, goes on to set out a series of potential pitfalls, one of which is failure to distinguish between the significant effects that are likely to influence the eventual decision and those of lesser concern. To make decisions based on the identified significant effects, it is important for them to be properly understood and GLVIA 3 goes on at its paragraph 3.36 to state as follows:

***"To overcome these potential problems, there should be more emphasis on narrative text describing the landscape and visual effects and the judgements made about their significance."***

36. The summary of the ES assessments concerning the potential effects on the AONB, set out at Annex 1 of this document, seeks to provide clarification with respect to the matter of both the nature of the effects and the geographical extent of significant effects on the SCHAONB special qualities arising from the Project. It summarises the extent and limitations of the significant effects on AONB special qualities and puts the geographic extent of these significant effects into context, extrapolating from assessments contained within the SLVIA in **ES Chapter 28** (APP-076), **Appendix 28.4 Landscape Assessment** (APP-559) and **Appendix**



**28.6 Suffolk Coastal Path Assessment (APP-561).** This note also draws on the **Applicant's Comments on Relevant Representations Natural England (AS-036)** and the **Applicant's Responses to Natural England's Deadline 1 Submissions (REP2-004)**.

37. Annex 1 does not represent any new or additional assessment of the effects, but draws together the key parts of the assessment from the ES and the relevant representations and responses as set out above. It is a direct response to matters raised by NE with respect to both the Geographical extent of the effects (referenced in **section 5** of this response) and their Nature, including further explanation relating to the significance judgements.
38. With respect to the assessments undertaken, it is clear that where significant effects to special qualities occur (at the coast in the particular geographic areas of the SCHAONB identified and in relation to the perception of offshore panoramic views), the judgement of significance is finely balanced and near to the threshold of significance. The magnitude of change is of medium or medium-low magnitude on special qualities (and therefore could reasonably be judged to be just above the threshold and 'significant' or just below the threshold and 'not significant') and in no cases are the impacts of higher levels of magnitude, which is an expression of the nature of the effect. The assessment and professional judgement took a precautionary approach in terms of the assessed significance and took on board the weight of other professional judgements expressed through the stakeholder consultations and the finely balanced relationship between the qualities and the nature of effect upon them was recorded as significant. In this regard, there is agreement between the Applicant and NE that these are finely balanced judgements near to the threshold of significance.
39. There is however another contextual matter that needs to be considered in making any judgements concerning these significant effects, and that is the frequency of the effects as they would be experienced by those enjoying the qualities of the SCHAONB. The SLVIA does not downgrade the magnitude of effect regarding duration or reversibility, as GLVIA 3 would allow, but takes these matters into account separately in coming to the judgement of significance. In this regard, the assessment also takes a precautionary approach to magnitude which is also a worst-case judgement. The matter of the frequency of the effects, and in particular, with regard to weather and visibility, other than in a worst-case good visibility scenario, is also an important matter to consider in understanding the likely effects upon the special qualities. Indeed, Schedule 3 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires consideration of the following factors:

*"3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2,*



*with regard to the impact of the development on the factors specified in regulation 5(2), taking into account— (inter alia)  
(f) the expected onset, duration, frequency and reversibility of the impact.”*

40. At paragraph 10 of NE's response, reference is made to weather conditions, correctly stating that a worst-case position is taken to be one where there is optimum visibility. The judgements concerning the significance of the effects have taken into account 'Duration' (whether effects would be short/medium/long term – in this case long term) and 'Reversibility' (whether or not effects would be temporary or permanent - in this case assumed to be permanent due to their 25 year lifespan, notwithstanding the turbines would be removed at the end of their life) as stated above. However, with regard to the matter of 'Frequency', the judgements concerning the significance of the effects **have not** considered the limitations of visibility out to sea at these distances where clear visibility to the horizon occurs infrequently, instead taking the 'worse-case' assumption that good visibility would apply at all times.

41. The SLVIA states as follows at its Para 72 Under heading 'Impact Significance – Visual Effects':

***“The assessment of visual effects assumes clear weather and optimum viewing conditions. This means that effects that are assessed to be significant may be not significant under different, less clear conditions. Viewing conditions and visibility tend to vary considerably and therefore the likelihood of effects resulting from the proposed East Anglia TWO project will vary greatly according to the prevailing viewing conditions.”***

42. The SLVIA also goes on to state as follows at its Para 107, concerning the SLVIA methodology (Appendix 28.2) under heading 'Frequency and Likelihood of Visual Effects – Weather Conditions':

***“The judgements made in the SLVIA are based on optimum 'very good' to 'excellent' visibility of the East Anglia TWO windfarm site. This assumption is assessed as the worst-case scenario, but in reality, the degree and extent of visual effects arising from the construction and operation of the offshore infrastructure is a combination of several different factors, including the prevailing weather conditions. The prevailing visibility weather can determine changes in character and visibility, with varied wind, light and tidal movements and the clarity or otherwise of the atmosphere. Collectively, these will combine to reduce the number of days upon which views of the East Anglia TWO windfarm site will be available from the coastline and hinterland, or to inhibit views, rendering them more visually recessive within the wider seascape. Viewing conditions and visibility have been found to vary in the study area, and the effects of the wind farm will vary greatly according to the***



***weather. This means that effects that are assessed to be significant may be not-significant under different, less clear conditions.”***

43. Further explanation is given concerning the likelihood of the worst-case conditions of good clear visibility arising at Para 108 of the SLVIA, where it deals with the use of Met Office data:

***“Although the SLVIA is based on ‘very good’ to ‘excellent’ visibility conditions, a description of visibility frequency is provided using METAR visibility data from the nearest Met Office stations that record visibility (Weybourne and Shoeburyness), to highlight potential trends in the visibility conditions of the study area. Both GLVIA3 (8.15) and SNH guidance (SNH 2017, para 39) refer to use of Met Office visibility data to assess typical visibility conditions within an area.***

44. Within the **Visual Assessment** (Appendix 28.5), there is an assessment of ‘likelihood of effect’ for each Viewpoint, subsequent to concluding the significance of effects.
45. Taking Viewpoint 4 at Southwold, (the closest viewpoint to the EA2 array at 33.6km to the north west of the array) as an example, the **Visual Assessment** (Appendix 28.5) sets out within the consideration of likelihood that:

***“Very good or excellent visibility required for the East Anglia TWO windfarm site to be visible to residents of Southwold at 32.6km. Visibility at or beyond this distance occurs approximately 33% of the time, over 10-year period 2007-2017 from Weybourne and 21% of the time from Shoeburyness (Met Office Visibility Data). The Visibility from Vessels data suggests visibility from the coast at a distance of greater than 32.6km would occur less than 10% of the time.”***

46. The SLVIA addresses in detail the matter of visibility and the frequency that clear visibility is likely to occur, and this confirms that the assessed worst case optimum visibility out towards the turbines and the horizon is infrequent. For the greater part of the time the clarity of long-distance views out to sea will not be part of the experience of those enjoying the coast. Under the more frequent sub optimal conditions, the effect of the turbines on views will not be significant. This needs to be taken into consideration alongside the nature of the effects (magnitude) and the effects subsequently being on the threshold of significance, alongside the geographical extent over which they are likely to be experienced. The matter of geographical extent, as raised by NE, is explored below.



## 5 Geographical extent of significant effects

47. REP3-120 also addresses the geographical extent of the significant effects and agrees with the Applicant that the extent of the significant adverse effects on some of the Special Qualities is geographically limited to the coastal edge of the SCHAONB and that consequently the AONB as a whole is not adversely affected. It appears that by this NE mean that not all parts of the AONB are affected, whereas the Applicants use of the phrase was in the context of the policy test and the integrity of the AONB as a whole not being adversely affected by the harms identified in the SLVIA, such that it was not compromised.
48. The test that requires to be informed by the assessment of effects is, as referenced above, whether the proposals would compromise the purposes of designation (para 5.9.12 of NPS EN-1). If the AONB as a whole is not affected, as is agreed by the Applicant and NE, it is recognised by the Applicant that it remains to be judged as to whether significant effects on some of the Special Qualities in part of the AONB, amount to sufficient harm to compromise the purposes of designation. In making this judgement, both the matters explored above in relation to the nature and frequency of the identified significant effects and the geographical extent over which they might be experienced, needs to be understood and taken into consideration.
49. NE state at paragraph 13 of their response that they consider that the constituent parts of the AONB are all as important as the AONB as a whole and it is immaterial that the AONB is not affected in overall terms. This is a misunderstanding of the point. The Applicants reference to the AONB in overall terms, as set out in the ES, is in relation to the effect of the identified significant effects on some of the special qualities along the coast, and their potential to compromise the purpose of designation and this judgement is then correctly expressed in the context of the whole AONB. The judgement made in the ES, is whether the identified harms represent a degree of harm to the AONB sufficient to compromise the purposes of designation or, due to the character and resilience of the AONB as a whole and the nature and extent of the effects, the purposes of designation would not be compromised. It is not the function or purpose of the SLVIA to undertake the planning balance nor the policy tests, but it is the function of the SLVIA to make and record the judgements that can be carried forward into the planning judgements, and this has been done in the assessments and summarised in Annex 1 of this response. The use of the phrase in overall terms is an expression of this test whereby it is concluded that the AONB would not be harmed in a manner or to a degree where the test in NPS EN-1 would not be met.



This requires an understanding not only of the nature of the significant effects as set out above, but also the geographical extent over which they may be experienced and how and when they might be experienced.

50. The designated area of the SCHAONB covers approximately 403km<sup>2</sup> stretching from Kessingland in the north, to the River Stour in the south. NE advised that there would be significant effects on the majority of the 35km SCHAONB coastline lying between the northerly extent of the AONB and south to Orford Ness. This is not the case, and the note at Annex 1 confirms this by drawing together the relevant assessments and judgements.
51. The SLVIA in **ES Chapter 28** (APP-076) confirmed that some significant effects on the SCHAONB were identified for the Project including in relation to specific individual 'special qualities', particularly those that relate to long distance panoramic views and the juxtaposition of elements in these views, as experienced from the coastal edge of the AONB looking out to sea.
52. These significant effects on SCHAONB special qualities are experienced from several separate stretches of narrow shingle coast (within LCT 05) - **between Walberswick, Dunwich and Minsmere (approx. 10km); to the south of Sizewell to Thorpeness (approx. 2.5km); between Thorpeness to the north of Aldeburgh (approx. 2km); and between Slaughden to Sudbourne Beach/Orford Ness (approx. 5km).** The effects on special qualities of these areas of the SCHAONB coast would be experienced intermittently, not continuously, from different sections of the Suffolk Coast Path (SCP), or informally when walking along the shingle beaches in these areas (off the defined route of the SCP).
53. Significant effects on SCHAONB special qualities are also experienced from the coastal edges of short sections of sea cliffs where the Estate Sandlands LCT extends to meet the sea at **Covehithe Cliffs on either side of Benacre Broad and Covehithe Broad and Easton Bavents (approximately 5km of coast) and at Dunwich Heath, between Dunwich and Minsmere Cliffs (approximately 3km of coast).** The effects on special qualities of the Covehithe area of the SCHAONB coast cannot be experienced from the SCP, which is routed well inland of the cliffs, and the effects experienced at Dunwich Heath are only experienced over a short section of the SCP where it crosses Dunwich Heath approaching the Coastguard Cottages at Minsmere Cliffs.
54. The significant effects on SCHAONB special qualities are therefore limited to specific locations, as set out in the ES, and are not experienced continuously along the SCHAONB coastline. These effects are experienced from specific 'destination' points accessed only from minor roads extending to the coast, rather than as part of an extended coastal experience. They are experienced from



specific sections of the SCP through these areas, but would not be experienced continuously from the SCP through the SCHAONB coastline, because the relevant areas are dispersed and occur in 'pockets' associated with particular areas of the coast. Furthermore, the means of accessing these areas, often the SCP, does not provide a continuous experience of these effects, as the SCP often diverts from the coast, passing through landscapes that have limited visibility, or landscapes where the SCHAONB special qualities in question are less apparent. The scenic qualities of the coast are varied and not always consistent between the different parts of this relevant stretch of SCHAONB coastline.

55. Where significant effects to special qualities occur, the judgement of significance is finely balanced and near to the threshold of significance. The magnitude of change is of medium or medium-low magnitude on special qualities (and therefore could reasonably be judged to be just above the threshold and 'significant' or just below the threshold and 'not significant'), and in no cases are the impacts of higher levels of magnitude (nature of the effect). The assessment and professional judgement took a precautionary approach in terms of the assessed significance and took on board the weight of other professional judgements expressed through the stakeholder consultations. In this regard, there is agreement between the Applicant and NE that these are finely balanced judgements near the threshold of significance.
56. For NE's position to be sustained, it would be necessary to conclude that the significant effects on some of the Special Quality Indicators and Special Qualities expressed along the coast, relating to views out of the AONB across the seascape to the far horizon, were both fundamental to the purposes for designation and affected to a sufficient degree, that the identified significant effects compromised those purposes. In reaching this conclusion it would need to be determined that these significant effects represented a level of change that the AONB was not sufficiently resilient to accommodate, notwithstanding that long distance and panoramic views would remain, and that the assessed change in the nature of these views was assessed as medium/moderate, and the judgements of significance are agreed to be finely balanced.
57. The Applicant, drawing upon the detailed assessments that have been undertaken, does not consider that this threshold has been reached. Any decision that the purposes of designation had been compromised would also have to be reached in the context of the Natural Beauty continuing to be expressed throughout the AONB, and that the greater part of special qualities of the AONB were not affected. It would also need to take into account that the experience to be enjoyed along the coastal edge of the AONB would remain one predominantly influenced by its Natural Beauty and Special Qualities. As stated in REP2-008, it



is important to consider that although a significant change will occur in some views on some occasions, long sweeping and distant views would remain, with big skies and extensive foregrounds of sea or shore. These will be seen as part of the complex experience of the other special qualities that will continue to be enjoyed in a multitude of ways, successively, sequentially and simultaneously, as people enjoy the Suffolk coast and its heathland.

58. The details drawn from the SLVIA and set out at Annex 1 summarise this element of the assessment as follows:

***“The construction and operation of the offshore infrastructure will result in a relatively low change to the strong character of the AONB, with its varied and distinctive landscapes continuing to define its overall character. It is not the overall character or physical features of the coastal edges of the AONB that will be changed, but to some degree the specific aesthetic/perceptual aspects of its character from localised areas of the coast where there are interactions between these aesthetic/perceptual aspects of the sea and the East Anglia TWO windfarm site. These effects arise as a result of change on some particular characteristics, not a change to all of the characteristics since the majority of elements, features and aesthetic/perceptual aspects will continue to contribute to the character and distinctiveness of the AONB and will not be changed or affected in the same way. The perception of most of the other AONB special qualities and key characteristics will remain unaffected by the construction and operation of the offshore infrastructure.”***

59. It is for these reasons, seeing the significant effects in the context of the experience of the AONB and its Natural Beauty, that REP2-008 concluded that the purposes of designation would not be compromised.





## 6 The future character of the SCHAONB

60. REP3-120 also refers to the future character of this AONB, and that although NE accept that there is an ambition of local authorities for the creation of an energy coast, that speculation about future projects is not relevant. REP3-120 sought to provide suitable context concerning the AONB and it was not speculation, but reference to the AONB management plan and the Special Qualities Indicator document. Unlike the majority of AONBs, this AONB has specifically addressed the matter of its existing energy infrastructure and ambitions for future energy projects and the Energy Coast. Indeed, the Management Plan anticipates that there will be further energy development that will have impacts upon the AONB and that they may cause significant effects.
61. The Special Qualities Indicator report (Suffolk Coast and Heaths Area of Outstanding Natural Beauty, Natural Beauty and Special Qualities Indicators, v1.8, LDA Design (November 2016)) states that offshore energy generation is part of a developing story of Suffolk's Energy Coast as follows:

***“More latterly the Sizewell nuclear complex highlights evidence of time depth across the landscape. Both the nuclear complex and the nearby infrastructure associated with offshore energy generation are part of a developing story of the Suffolk's Energy Coast” (page 6)***

62. The Management Plan (SCHAONB-Management-Plan-2018 to 2023) also recognises the role energy developments will play along this coast and that development may cause significant effects yet to pass the National Policy tests, where it states as follows:

***“This part of Suffolk is promoted as the ‘Energy Coast’ by the local authorities, reflecting the nuclear power complex at Sizewell and offshore wind farms and the associated infrastructure” (page 8 (no paragraph numbers))***

*And*

***“The Suffolk Coast is being promoted by the local authorities as an Energy Coast, with proposals for a new nuclear build at Sizewell, offshore wind farms and electricity interconnectors linking the UK with mainland Europe. These developments will bring national benefits but need to be mindful of the nationally designated landscapes, and the concerns of local residents and existing***



***businesses, many of which rely on the outstanding landscapes in which they operate.***

*And*

***Such major developments will impact upon the AONB and development proposals should be explicit in setting out the impacts of the developments. Once national or local decisions on major development have been made, the AONB Partnership will work constructively with developers to reduce and mitigate adverse impacts, on a range of natural beauty indicators. Major developments that do go ahead within or adjacent to the AONB (i.e. that pass the tests set out in National Policy Statements and National Planning Policy Framework) and that cause a significant impact on landscape and scenic beauty must include an assessment of the detrimental effect on the environment, landscape and/or seascape, biodiversity and recreational opportunities.***

***Mitigation plans should also be put forward to avoid or, if that is not possible, to minimise adverse impacts and residual effects within the AONB. This should be achieved through appropriate landscape and amenity enhancements that are aligned to this Management Plan. Where the unavoidable adverse impacts are significant this may well require an ambitious off-site mitigation package, in addition to any on-site works. Full landscape and visual impact assessment will be a fundamental requirement of such major developments.” (page 46 (no paragraph numbers))***



## 7 Comparisons with other Offshore wind farms

63. Paragraph 5.9.19 of NPS EN1 states that: “It may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on sensitive receptors. This may assist the IPC in judging the weight it should give to the assessed visual impacts of the proposed development”.
64. Whilst there is no suggestion in the NPS that other interested parties should be presenting examples of unacceptable applications (the policy specifically refers to “permitted” examples), the Applicant assumes NE is no doubt aiming to assist the ExA in judging weight in some way.
65. The “magnitude of impact” of the cases refused consent/permission, cited by NE however is far very different from, and not at all “similar” to, the assessed impacts of EA2 for the reasons set out below.

### 7.1 Navitus Bay

66. This example is not “permitted infrastructure”, nor did the application present a “similar magnitude of impact” given that:
  - I. unlike the EA2 Project, the Navitus Bay application included “moderate” and “major” impacts on the Isle of Wight and Dorset AONBs and on heritage assets within both<sup>7</sup>;
  - II. the Navitus Bay site was 13.87km from the shore of the Isle of Wight (and a similar distance from the Dorset) AONB coastlines, whereas the Project’s windfarm site is well above the double the distance away from the Suffolk Coast and Heaths AONB coastline, at 32.6km offshore;
  - III. the Navitus Bay site was enclosed on almost three sides by cliff edged coastline, presenting a convex concentric ring of protected landscapes closer around the site, whereas the Suffolk coastline presents a generally straighter line and an ultimately concave, low lying coastline turning away in the north and the south, from the Project’s windfarm site, which in contrast is much further away and is located on and beyond the horizon; and

---

<sup>7</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010024/EN010024-000810-6.1.2.13%20Volume%20B%20Offshore%20Chapter%2013%20Seascape%20Landscape%20and%20Visual.pdf> P188



IV. the range of designations applying to the Dorset coastline was far wider and bigger than those applying to the Suffolk coastline which is neither a National Park nor a World Heritage Site, nor is the AONB as extensive in terms of length of coastline affected as applied in the Navitus Bay example.

67. To be considered as part of the examination, examples of this kind need to be both important and relevant to the decision. Whether or not Navitus Bay is important, it is clear for all the reasons above it is not relevant as a comparable project.

## 7.2 Rampion Offshore Wind Farm

68. The Applicant notes that NE appears to agree in REP3-120 that this is a comparable example of permitted infrastructure and the question to be addressed is simply whether impacts are “appropriately mitigated and minimised” (NE p.26 para 102).

## 7.3 Sizewell C - Girling vs East Suffolk Council

69. NE state this is a relevant example because “*the National Planning Policy Statement (NPPF) test is the same as that used in EN-1*” and quotes the NPPF test as follows:

*“Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.”*

70. However, the test at paragraph 5.9.10 of NPS EN1 is **not** the same as the wording of the NPPF quoted by NE. The NPS policy test is in fact clearly different and written with the emphasis on granting (rather than refusing) consent”.

*“5.9.10 Nevertheless, the IPC may grant development consent in these areas in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include...”*

71. Sizewell C was not quoted by the Applicant, despite the much greater impacts it would have on the SCHAONB, as the ExA may consider it not sufficiently similar. Nonetheless, since the case has been raised by NE, the Sizewell C enabling works including 30ha of development on Coronation Wood, within the SCHAONB (a decision upheld by the High Court<sup>8</sup>) are clearly an example of “permitted infrastructure” which would have much greater landscape effects<sup>9</sup> on it than the

<sup>8</sup> *Girling v East Suffolk Council* [2020] EWHC 2579  
<https://www.bailii.org/ew/cases/EWHC/Admin/2020/2579.html>

<sup>9</sup> <http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01474128.pdf>



---

proposed EA2 windfarm site 32.6km away from the AONB. Sizewell C enabling works sit alongside Sizewell B, also permitted within the AONB<sup>10</sup>.

#### 7.4 East Heselton, North York Moors

72. As NE state in the Innogy case (taken to be the proposed wind farm at East Heselton Wold) “analysis here was in part based on the statutory purpose of National Parks, rather than AONBs”.
73. For this reason, and because it is not an example of “permitted infrastructure”, and because it was a decision taken under different legislative and policy regime, with very different landscape and wind farm policies applying, it is not considered by the Applicant important and relevant to this decision.

---

<sup>10</sup> Sizewell Nuclear Power Station sits in the SCHAONB and was consented despite the Inspector’s description that “The Sizewell site is within the Suffolk Heritage Coast and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty....The development of Sizewell B would be a massive intrusion into the area [with] massive” landscape impacts.

<https://api.parliament.uk/historic-hansard/lords/1987/mar/02/sizewell-power-station-inquiry-report>



## 8 Conclusions and recommendations

74. NPS EN1 policies 5.9.12 and 13 (supported by NPS EN3 policy 2.6.208 and 209) are directly relevant to the effects of development outside an AONB, such as the EA2 offshore wind some 32.6km away, and form the key NPS test in accordance with which (under S104(3) PA2008) the application must be decided. NE and the Applicant agree on the relevance of this policy. However, NE posit a range of other alternative policies (including policy on development within and AONB) which are not the test to be applied and which are not considered important and relevant.
75. The Applicant agrees with NE's clear statement that "Natural England and the Applicant agree that the extent of the significant adverse effects on some special qualities is geographically limited to the coastal edge of the SCHAONB. Consequently, the AONB as a whole is not directly and adversely effected in 'overall terms'". (REP3-120, paragraph 12).
76. However, it is recognised by the Applicant that a key question is, whether significant effects on some of the Special Qualities in part of the AONB, amount to sufficient harm to compromise the purposes of designation. Furthermore, it should be noted that where significant effects to special qualities do occur, the judgement of significance is finely balanced and near to the threshold of non-significance.
77. The Applicant, drawing upon the detailed assessments that have been undertaken within the SLVIA, does not consider that this threshold has been reached. The Applicant has set out that the clear findings of the SLVIA have been reported, and considerations made as to their appropriate context, relevant to the consideration in the planning balance and in relation to the relevant policy tests. In the SLVIA, levels or degrees of significance are not set out, however the Applicant's Statutory Purposes clarification note sought to make clear the Nature of the Effect, and in doing so, assist the understanding of an identified significant effect and provide appropriate context, to understand its effect on the experience of the SCHAONB. Further to this, regarding matters of nature and duration, the SLVIA clearly sets out that a worst-case of 'very good' or 'excellent' visibility has been assumed in concluding assessments of significance. However, it is important to the context of the assessment of significance, that both the duration (expressed as the 'likelihood of effects' which considers weather data) and geographical extent are taken into account in determining the significance of effects upon some of the special qualities of the SCHAONB.



- 
78. Conclusions on the potential effects of the EA2 Windfarm should also be reached with regard to the role energy developments will play along this coast and the future character of the SCHAONB, and which is recognised within the AONB Management Plan and Special Qualities. Within REP2-008 matters relating to the future character of the AONB were made with reference to the AONB management plan and the Special Qualities Indicator document and not in speculation. It is evident that offshore energy generation is part of a “developing” story of the Suffolk Coast (to quote the Special Qualities) and which has an existing and inevitable degree of effect upon the SCHAONB, but is not one which the Applicant considers to compromise the purposes of designation of the AONB.
79. With the exception of Rampion Offshore Wind Farm and Sizewell C Nuclear Power Station enabling works, examples cited by NE are not examples of “permitted infrastructure” which NPS EN1 suggests can be put forward. NE’s remaining examples are of projects located in relation to entirely different designations and/or policy regimes. The differences from the EA2 Project these exhibit are striking, for example the Navitus Bay wind farm proposal had “major” landscape effects, was only 13km from a coastline that wrapped around it and included a National Park and a World Heritage Site, that was refused consent which cannot reasonably be compared with the EA2 Project’s windfarm site which does not involve major landscape effects, is 32.6km from a coastline which turns away from it and which involves neither of these landscape designations. However, the Applicant agrees with NE that both Rampion and, since it has been raised by NE, Sizewell C (enabling works) are relevant examples of “permitted infrastructure” infrastructure which have much greater landscape effects.



# Appendix 1 - Geographic extent of significant effects on AONB special qualities

## 8.1 Introduction

80. This clarification note has been prepared on behalf of East Anglia TWO Limited (the Applicant) to clarify aspects of the East Anglia TWO Development Consent Order (DCO) applications (the Applications).
81. This clarification note considers the potential for the East Anglia TWO project (the Project) to bring about effects on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (the AONB). It is applicable to East Anglia TWO only and therefore is endorsed with the blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004).
82. The Applicant submitted at Deadline 2 a clarification note addressing '**Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy**' (REP2-008). This considered the potential for the Project to bring about effects on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (the AONB) with regard to the policy context which is applicable for the Project.
83. Natural England provided comments on this 'Statutory Purposes note' in Appendix E3 to the Natural England Deadline 3 Submission in its **Deadline 3 Submission - Appendix E3 - Comments to Effects with Regard to SCHAONB and Accordance with NPS Policy** (REP3-120). Natural England offered commentary on '*four main points which form the nub of the matter*'. One of these matters, identified in section C2, is the geographical extent of the significant effects on the Special Qualities of the SCHOANB.
84. This note seeks to provide clarification with respect to the matter of geographic extent of significant effects on AONB special qualities arising from the East Anglia TWO offshore windfarm. It summarises the extent and limitations of the significant effects on AONB special qualities and puts the geographic extent of these significant effects into context, extrapolating from assessments contained within the SLVIA in **ES Chapter 28** (APP-076), **Appendix 28.4 Landscape Assessment** (APP-559) and **Appendix 28.6 Suffolk Coastal Path Assessment** (APP-561).





85. This note also draws on the **Applicant's Comments on Relevant Representations** Natural England (AS-036) and the **Applicant's Responses to Natural England's Deadline 1 Submissions** (REP2-004).

## 8.2 Geographical extent of significant effects - SCHAONB

### 8.2.1 Introduction

86. The geographic extent over which the landscape effects will be experienced as a result of the East Anglia TWO offshore windfarm is described and assessed in the SLVIA in **ES Chapter 28** (APP-076), in line with guidance in GLVIA3 (para 5.50), which recommends that:

*'The geographical area over which the landscape effects will be felt must also be considered. This is distinct from the size or scale of the effect – there may for example be moderate loss of landscape elements over a large geographic area, or a major addition affected a very localised area'.*

87. GLVIA3 (para 5.50) also identifies a series of scales of geographic extent over which landscape effects may occur, as follows:

- *'At the **site level**, within the development site itself.*
- *At the level of the **immediate setting** of the site.*
- *At the scale of the **landscape type or character area** within which the proposal lies.*
- *On a larger scale, influencing **several landscape types** or character area'.*

88. The geographic extent of landscape effects arising from the East Anglia TWO offshore windfarm are identified in the SLVIA in **ES Chapter 28** (APP-076) as influencing several landscape character types (LCTs) within the AONB. It is within these LCTs that the special qualities of the AONB are affected by the East Anglia TWO offshore windfarm.

89. The magnitude of change that will result from the East Anglia TWO offshore windfarm on landscape character and 'special qualities' varies within this geographic area, however, depending on the size or scale of the change relative to the particular character and qualities that are experienced in different locations of the SCHAONB.

### 8.2.2 Description of Geographic Extent of Significant Effects on SCHAONB Special Qualities

90. The designated area of the SCHAONB covers approximately 403km<sup>2</sup> stretching from Kessingland in the north to the River Stour in the south, as noted in the SLVIA (**Appendix 28.4**) and the SCHAONB Management Plan (SCHAONB, 2013) and shown in full in **Figure 28.13** (APP-327).



91. The Applicant does not believe that is appropriate or in line with best practice to provide a mathematical quantification of the extent of the significant adverse effects on the special qualities of the SCHAONB, such as with a percentage figure for the geographical area affected. It is recognised in GLVIA3 that *'assessing visual effects is not a quantitative process'* (para 6.3) and that *'While there is some scope for quantitative measurement of some relatively objective matters... much of the assessment must rely on qualitative judgement about the significance of change'* (para 2.23).
92. The geographic extent of landscape effects is principally assessed in the **SLVIA Chapter 28** (APP-076) through description of the extent of perceived changes to LCTs and other receptors within the SCHAONB (such users of the Suffolk Coast Path (SCP) or at locations represented by viewpoints) arising from visibility of the East Anglia TWO offshore windfarm.
93. Natural England advised that there would be significant effects on the majority of the 35km SCHAONB coastline lying between the northerly extent of the AONB and south to Orford Ness. The SLVIA in **Chapter 28** (APP-076) has identified locations along this coastline where the views out to sea obtained by visual receptors may be significantly affected as assessed in relation to the viewpoint assessment in **Appendix 28.5** (APP-560) and the SCP assessment in **Appendix 28.6** (APP-561). However, the significant effects on the views from these specific locations and from intermittent stretches of the SCP do not necessarily translate directly to significant effects on the special qualities of the SCHAONB, which are instead considered relative to the landscape character types arising along the SCHAONB coastline, with effects on the special qualities relating to sea views occurring only intermittently.
94. In addition, it is important to recognise that whilst there may be locations along the 35km stretch of coast where there would be significant effects on the views out to sea, this is unlikely to be experienced continuously due to the pattern of the communications along the East Suffolk Coastline within the SCHAONB. The network of roads within the SCHAONB is such that there are very few roads that run continuously along this section of the coastline, and where they run close to it they are often set back with intervening landform creating intermediate screening of the sea views. Instead access to the coast is from intermittent perpendicular roads leading from the main routes and providing access to the coast where sea views are experienced or allow connections to the SCP and the other local routes/access to the beach.
95. The SCHAONB will often be experienced from these key coastal locations over relatively short sections of the coast at any one time. A more continuous experience of the SCHAONB coastline may be experienced while walking longer sections of the coast, which is most likely to be undertaken by following the SCP,



however the SCP does not allow a continuous exposure to the effects, as the SCP often diverts from the coast, passing through landscapes that have limited visibility, or landscapes where the SCHAONB special qualities are less apparent. Full technical assessments of the effects on the views from the SCP are provided in **Appendix 28.6** (APP-561). ZTVs illustrating the predicted visibility of the East Anglia TWO windfarm site from the SCP are shown in **Figure 28.23a** (APP-351) and **Figure 28.23b** (APP-352). These assessments demonstrate that although the SCP runs through a variety of landscapes which typify the character of the SCHAONB, the length of the SCP within the AONB where views would be significantly affected by the East Anglia TWO windfarm site is relatively short at approximately 8km and separated across different sections at Kessingland, Southwold, Walberswick/Corporation Marshes, Dunwich Heath and Thorpeness.

96. It is acknowledged that people may divert at points from the SCP to appreciate views from the nearby beaches and locations with clear views out to sea as opposed to continuously following the SCP, where the visibility out to sea is sometimes more restricted. However the SCP offers many other appealing and scenic views and landscape experiences along its length other than the view out to sea and therefore it does provide a reasonable proxy for how the coastal views are appreciated by people.
97. The visibility of the East Anglia TWO offshore windfarm within the SCHAONB, and therefore potential geographic extent of effect, is shown in the Zone of Theoretical Visibility (ZTV) (**ES Figure 28.18**) (APP-343) and is supported by further information gained by field survey verification work. The assessment of the effects on special qualities that actually occur within the SCHAONB are informed by the ZTV, but also the detailed survey work undertaken in the field within the SCHAONB.
98. The main LCTs that make up the AONB are identified in the SLVIA in **ES Chapter 28** (APP-076). Several of these LCTs are identified as having no potential to be significantly affected by the construction and operation of the East Anglia TWO offshore windfarm, due to their inland locations, long distance and/or substantial amount of intervening screening between these areas of the SCHAONB and the East Anglia TWO windfarm site. These LCTs where there no significant effects on AONB Special Qualities are identified as follows:
- Estate Farmlands (LCT 11 and 15).
  - Rolling Estate Sandlands (LCT 16).
  - Saltmarsh and Intertidal Flats (LCT 20).
  - Valley Meadowlands (LCT 26).



99. The relevant geographic areas of the SCHAONB that may be affected by the East Anglia TWO offshore windfarm are introduced in **section 28.2.2** of **ES Appendix 28.4** (APP-559). Broadly, the Suffolk Heritage Coast shown in **Figure 28.13** (APP-327) is identified as representing the geographic extent of the AONB most likely to experience effects arising from the East Anglia TWO offshore windfarm. It covers the coast and the mouths of the main estuaries between Kessingland in the north and Felixstowe in the south.

100. **ES Chapter 28** (APP-076) includes the following description (para 192) which provides a good overview of the relevant special qualities and areas of geographic interest (emphasis added):

*'The scenic qualities and interest are particularly defined by the coast and views out to sea; shingle features of the coast, some vegetated, notably **Orford Ness**; prominence of **short sections of crumbling soft cliffs, such as at Dunwich and Covehithe**; **bodies of water (broads/saline lagoons)**; **Shingle Street**; **Benacre and Easton Broads**; and seascape setting of the **coastal areas of the AONB**. There are **pockets of relative wildness associated with coast**, in this largely farmed and settled landscape. A number of coastal locations within the AONB provide opportunities to experience attributes of relative wildness, including **Orford Ness, Minsmere, Dunwich Heath and the marshlands/estuaries**, where the character of the landscape and views afforded out to sea and along the coast are highly valued. **The seascape setting of the coastal areas of the AONB** contributes to the perception of wildness attributes and relative tranquillity. The **nearshore waters and inland waterways** are valued sailing/boating areas, especially the **Orwell and Deben estuaries** with extensive moorings and boatyards'.*

101. Within this broad area, certain LCTs that define these key coastal areas of the SCHAONB are identified as the geographic areas that are most susceptible to the influence of the East Anglia TWO offshore windfarm – those that have a seascape setting. These LCTs are identified and assessed in further detail in the SLVIA **ES Chapter 28** (APP-076) as follows:

- Coastal Dunes and Shingle Ridges (LCT 05);
- Coastal Levels (LCT 06);
- Estate Sandlands (LCT 07) and
- Open Coastal Fens (LCT 08).

102. The geographic extent of effects of the East Anglia TWO windfarm site within each LCT within the SCHAONB is described and specific geographic sub-areas or units (Areas A, B, C etc) are identified within these LCTs in the assessments



in **section 28.2.1** to further describe the geographic extent of effects within the SCHAONB.

103. The geographic location of these LCTs and the sub-areas/units in each LCT relative to the AONB are shown in **ES Figure 28.17b** to **Figure 28.17I** (APP-332 to APP-342).
104. The effects of the East Anglia TWO offshore windfarm on each special quality of the AONB (landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage and cultural heritage features) is then assessed in **Table A28.3** of **ES Appendix 28.4** (APP-559) with reference to these particular sub-areas/units of these LCTs within the SCHAONB.
105. A summary of the geographic extent of significant effects on AONB special qualities within each of these LCTs within the SCHAONB, as assessed in the SLVIA in **ES Chapter 28** (APP-076), is provided below in **Table 2.1**. In each case the ES Figure number showing the sub-area/unit of each LCT within the SCHAONB is identified for cross reference to the geographic extent of the LCT within which significant effects on special qualities may occur, as well relevant sections of the SCP and representative viewpoints, where effects on special qualities may be experienced.



Table 2.1 Summary of geographic extent of significant effects on SCHAONB special qualities

LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
5. Coastal Dunes and Shingle Ridges  Area C: Southwold to the north side of Orford Ness  Shown in: <b>Figure 28.17c</b> (APP-333) and <b>Figure 28.17d</b> (APP-334)	Medium / Significant	<b>Landscape quality –</b> <i>'Intactness of the landscape in visual, functional and ecological perspectives'</i> .	<i>Close-knit interrelationship of semi-natural and cultural landscapes creating a <u>juxtaposition of elements in a relatively small area.</u></i>	Introduces a further element into the seascape setting of the coastal areas of the AONB, adding to the juxtaposition of different elements perceived from the coastal edges of the AONB. Introduction of a new wind turbine influence to the simple landscape composition, creating new focal point that may partially alter the 'vastness' of the seaward aspect and occupies part of open sea skyline. In terms of this special quality, the East Anglia TWO offshore windfarm site does not affect the immediate setting of the AONB, but will be seen on and beyond the horizon, as a 'horizon development' to a large open seascape, rather than being viewed 'within' its seascape/landscape.	Restricted to the narrow coastal strip of Area C of the Coastal Dunes and Shingle Ridges LCT (05), where changes in the sea are experienced readily from the coastal edge.  Although Area C extends from Southwold to Orford Ness, the scenic qualities are varied and not always consistent between the different stretches of this area of the LCT. In close proximity to Southwold and Aldeburgh, scenic qualities are influenced by the presence of seafront developments and urban activities. The scenic qualities of the Sizewell to Thorpeness section of the LCT is particularly influenced by the presence of Sizewell Nuclear Power Station.  As such, effects on special qualities do not occur consistently along the full length of Area C but occur on the qualities experienced from several more natural/remote stretches of narrow shingle coast, largely <b><u>between Walberswick, Dunwich and Minsmere (approx. 10km); to the south of Sizewell to Thorpeness (approx. 2.5km); between Thorpeness to the north of Aldeburgh (approx. 2km);</u></b>
		<b>Scenic quality –</b> 'A distinctive sense of place'	<i>Unique character defined by semi-natural and cultural landscapes creating a <u>juxtaposition of elements in a relatively small area.</u></i>		
		<b>Scenic quality –</b> <i>'Striking landform'</i>	<i>Sea cliffs and shingle beaches contrasting to flat and gently rolling Sandlings heaths and farmland. Extensive <u>shingle beaches and shallow bays provide opportunities for long</u></i>		



LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
			<i>distance and panoramic views including out to sea and along the Heritage Coast</i>	distance and panoramic views including out to sea and along the Heritage Coast.	<b><u>and between Slaughden to Sudbourne Beach/Orford Ness (approx. 5km).</u></b>  The effects of the East Anglia TWO windfarm site on the character and special qualities of these areas of the SCHAONB coast can be experienced intermittently, but not continuously, from different sections of the Suffolk Coast Path (SCP).
		<b>Relative wildness – ‘a sense of openness and exposure’</b>	<i><u>Expansive views offshore emphasise sense of openness and exposure on open and exposed coastline and on the Sandlings heaths.</u></i>	Introduces a further visible element in the sea view component of the expansive views offshore from the open and exposed coastline along the open coast and out to sea. The East Anglia TWO windfarm site may compete with the sense of openness, as an element that may appear to define the limit of the view on the horizon, however due to the relatively low elevation, simple form of the coastline and its long distance offshore, the East Anglia TWO windfarm site will be seen on and beyond the horizon, as a ‘horizon development’.	<b><u>Walberswick, Dunwich and Minsmere</u></b> – experienced from parts of Section 5 of the SCP between Walberswick and Dunwich Forest, before this path extends inland across Corporation Marshes away from LCT into Dunwich Forest, or by walking along the shingle beach between Walberswick and Dunwich; and parts of Section 7 of the SCP (Minsmere), however this generally lies on the landward side of the shingle dunes <b>Figure 28.24a</b> (APP-353).  Representative viewpoints from this geographic area - <b>Viewpoint 6 Walberswick Figure 28.30a-g</b> (APP-360) and Viewpoint 7 Dunwich <b>Figure 28.31a-g</b> (APP-361).  <b><u>Sizewell to Thorpeness</u></b> - experienced from parts of Section 7 of the SCP (to the



LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
					<p>south of Sizewell), before this path extends inland to Thorpeness village <b>Figure 28.24a</b> (APP-353).</p> <p>Representative viewpoint from this geographic area - <b>Viewpoint 11 Suffolk Coastal Path, between Thorpeness and Sizewell Figure 28.35 a-f</b> (APP-365).</p> <p><b><u>Between Thorpeness to the north of Aldeburgh</u></b> - experienced from parts of Section 8 of the SCP, before it extends inland at Aldeburgh <b>Figure 28.24b</b> (APP-354).</p> <p>Representative viewpoint from this geographic area – Viewpoint 12 Thorpeness Figure 28.36a-e (APP-365).</p> <p><b><u>Slaughden to Sudbourne Beach/Orford Ness</u></b> – cannot be experienced from the SCP, which takes a route inland at Aldeburgh around the River Alde and Ore, accessed from Martello Tower at Slaughden, via track and shingle beach between River Ore and the sea <b>Figure 28.24b</b> (APP-354).</p>
7. Estate Sandlands	Medium / Significant	<b>Landscape quality –</b> <i>'Intactness of</i>	<i>Close-knit interrelationship of semi-natural and cultural</i>	Introduces a further element into the seascape setting of the coastal areas of the AONB, adding to the	Restricted to the coastal edges of short sections of sea cliffs where the LCT extends to meet the sea at <b><u>Covehithe</u></b>





LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
Area A: Covehithe to Benacre and Easton Bavents  Shown in: <b>Figure 28.17i</b> (APP-339)		<i>the landscape in visual, functional and ecological perspectives</i> .	<i>landscapes creating a <u>juxtaposition of elements in a relatively small area.</u></i>	juxtaposition of different elements perceived from the coastal edges of the AONB. Introduction of a new wind turbine influence to the simple landscape composition, creating new focal point that may partially alter the 'vastness' of the seaward aspect and occupies part of open sea skyline. In terms of this special quality, the East Anglia TWO offshore windfarm site does not affect the immediate setting of the AONB, but will be seen on and beyond the horizon, as a 'horizon development' to a large open seascape, rather than being viewed 'within' its seascape/landscape.	<b><u>Cliffs, on either side of Benacre Broad and Covehithe Broad, and at Easton Bavents</u></b> (approximately 5km of coast), where its coastal edges are influenced by the open sea and exposed to changes resulting from the East Anglia TWO windfarm site.  The effects of the East Anglia TWO windfarm site on the character and special qualities of these areas of the SCHAONB coast cannot be experienced from the SCP, which takes a route well inland of the cliffs and inland of Benacre, Covehithe and Easton Broads <b>Figure 28.24a</b> (APP-353). Access is via local Public Right of Way (PRoW) from Covehithe to Covehithe Cliffs, informal tracks at field edges of the sea cliffs or along the shingle beaches below the cliffs.  Representative viewpoint from this geographic area - <b>Viewpoint 3 Covehithe Figure 28.27a-g</b> (APP-357).
		<b>Scenic quality – 'A distinctive sense of place'</b>	<i>Unique character defined by semi-natural and cultural landscapes creating a <u>juxtaposition of elements in a relatively small area.</u></i>		
		<b>Scenic quality – 'Striking landform'</b>	<i><u>Sea cliffs and shingle beaches contrasting to flat and gently rolling Sandlings heaths and farmland. Extensive shingle beaches and shallow bays provide opportunities for long distance and panoramic views including out to sea</u></i>		



LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
			<i>and along the Heritage Coast.</i>		
		<b>Scenic quality – ‘Appeal to the senses’</b>	<i><u>Large open vistas across heaths and along the coast, out to sea and from sea to coastline, with memorable views and eye-catching features or landmarks.</u></i>	Introduces a further visible element in sea view component of the large open vistas across heaths and along the coast out to sea from localised areas of the coast. The East Anglia TWO windfarm site may contrast or compete with other landmarks along the coast and out to sea as a focal point.	
		<b>Relative wildness – ‘a sense of openness and exposure’</b>	<i><u>Expansive views offshore emphasise sense of openness and exposure on open and exposed coastline and on the Sandlings heaths.</u></i>	Introduces a further visible element in sea view component of the expansive views offshore from the heaths and along the open coast out to sea. The East Anglia TWO windfarm site may compete with the sense of openness, as an element that may appear to define the limit of the view on the horizon, however due to the relatively low elevation of the heaths, simple form of the coastline and its long distance offshore, the East Anglia TWO windfarm site will be seen on and beyond the horizon, as a ‘horizon development’.	



LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
7. Estate Sandlands  Area C: Localised area at Dunwich Heath/Cliffs  Shown in: <b>Figure 28.17j</b> (APP-340)	Medium / Significant	<b>Landscape quality –</b> ‘Intactness of the landscape in visual, functional and ecological perspectives’.	<i>Close-knit interrelationship of semi-natural and cultural landscapes creating a <u>juxtaposition of elements in a relatively small area.</u></i>	Introduces a further element into the seascape setting of the coastal areas of the AONB, adding to the juxtaposition of different elements perceived from the coastal edges of the AONB. Introduction of a new wind turbine influence to the simple landscape composition, creating new focal point that may partially alter the ‘vastness’ of the seaward aspect and occupies part of open sea skyline. In terms of this special quality, the East Anglia TWO offshore windfarm site does not affect the immediate setting of the AONB, but will be seen on and beyond the horizon, as a ‘horizon development’ to a large open seascape, rather than being viewed ‘within’ its seascape/landscape.	Restricted to the coastal edges of localised area of Estate Sandlands Area C around <b><u>Dunwich Heath, between Dunwich and Minsmere Cliffs</u></b> (approximately 3km of coast) where this area of the LCT meets the sea and its coastal edges are influenced by the open sea and exposed to changes resulting from the East Anglia TWO windfarm site.  The effects of the East Anglia TWO windfarm site on the character and special qualities of this area of the SCHAONB coast can be experienced from a short section of the SCP (Section 6) <b>Figure 28.24a</b> (APP-353) where it crosses Dunwich Heath approaching the Coastguard Cottages at Minsmere Cliffs and from the PRoW that extends north from the Coastguard Cottages to Minsmere Road. Much of the route of the SCP across Dunwich Heath extends inland away from the coast through heaths and forest, where the special qualities are not affected.  Representative viewpoint from this geographic area – <b>Viewpoint 8 Dunwich Heath Figure 28.32a-h</b> (APP-362).
		<b>Scenic quality –</b> ‘A distinctive sense of place’	<i>Unique character defined by semi-natural and cultural landscapes creating a <u>juxtaposition of elements in a relatively small area.</u></i>		
		<b>Scenic quality –</b> ‘Striking landform’	<i><u>Sea cliffs and shingle beaches contrasting to flat and gently rolling Sandlings heaths and farmland. Extensive shingle beaches and shallow bays provide opportunities for long distance and panoramic</u></i>	Partial loss of open sea skyline in long distance and panoramic views out to sea and along the Heritage Coast, from elevated vantage points, due to the lateral spread of wind turbines on the seaward horizon experienced from the AONB coastline. Addition of elements which may change the long distance and panoramic views	



LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
			<i>views including out to sea and along the Heritage Coast.</i>	including out to sea and along the Heritage Coast.	
		<b>Scenic quality – ‘Appeal to the senses’</b>	<i>Large open vistas across heaths and along the coast, out to sea and from sea to coastline, with memorable views and eye-catching features or landmarks.</i>	Introduces a further visible element in sea view component of the large open vistas across heaths and along the coast out to sea from localised areas of the coast. The East Anglia TWO windfarm site may contrast or compete with other landmarks along the coast and out to sea as a focal point.	
		<b>Relative wildness – ‘a sense of openness and exposure’</b>	<i>Expansive views offshore emphasise sense of openness and exposure on open and exposed coastline and on the Sandlings heaths.</i>	Introduces a further visible element in sea view component of the expansive views offshore from the heaths and along the open coast out to sea. The East Anglia TWO windfarm site may compete with the sense of openness, as an element that may appear to define the limit of the view on the horizon, however due to the relatively low elevation of the heaths, simple form of the coastline and its long distance offshore, the East Anglia TWO windfarm site will be seen on	



LCT	Magnitude of change / Significance of Effect	Special Quality Factor/sub-factor	Relevant part of SCHAONB Indicator	How Special Quality is Affected (summarised from ES Special Qualities Assessment)	Geographic Extent of Significant Effect
				and beyond the horizon, as a 'horizon development'.	



### 8.2.3 Summary and Conclusions

106. The Applicant and Natural England agree that the extent of the significant adverse effects on some special qualities is geographically limited to the coastal edge of the SCHAONB.
107. The East Anglia TWO windfarm site is assessed in the **ES Chapter 28** (APP-076) as resulting in significant, long-term but reversible effects on the perceived landscape character of a narrow strip of the immediate coastal LCTs forming the closest part of the Suffolk coastline between Southwold and the north side of Orford Ness – consisting of specific parts of the Coastal Dunes and Shingle Ridges LCT (05) and the coastal edges of the Estate Sandlands LCT (07).
108. The SLVIA in **ES Chapter 28** (APP-076) confirmed that some significant effects on the SCHAONB were identified for the East Anglia TWO offshore windfarm including in relation to specific individual 'special qualities', particularly those that relate to long distance panoramic views and the juxtaposition of elements in these views, as experienced from the coastal edge of the AONB looking out to sea.
109. While the relevant stretch of SCHAONB coastline is between Southwold and the north side of Orford Ness, significant effects on special qualities of the SCHAONB are limited to a number of locations or sections of the coast within this length, as summarised in **Table 2.1** above and set out in the SLVIA in **ES Chapter 28** (APP-076) and **Appendix 28.4** (APP-559).
110. These significant effects on SCHAONB special qualities are experienced from several separate stretches of narrow shingle coast (within LCT 05) - **between Walberswick, Dunwich and Minsmere (approx. 10km); to the south of Sizewell to Thorpeness (approx. 2.5km); between Thorpeness to the north of Aldeburgh (approx. 2km); and between Slaughden to Sudbourne Beach/Orford Ness (approx. 5km)**. These areas are shown in **Figure 28.17c** (APP-333) and **Figure 28.17d** (APP-334) of the ES. The effects on special qualities of these areas of the SCHAONB coast would be experienced intermittently, not continuously, from different sections of the Suffolk Coast Path (SCP), shown in **Figure 28.24a** (APP-353) and **Figure 28.24b** (APP-354) or informally when walking along the shingle beaches in these areas (off the defined route of the SCP).
111. Significant effects on SCHAONB special qualities are also experienced from the coastal edges of short sections of sea cliffs where the Estate Sandlands LCT extends to meet the sea at **Covehithe Cliffs on either side of Benacre Broad and Covehithe Broad and Easton Bavents (approximately 5km of coast) and at Dunwich Heath, between Dunwich and Minsmere Cliffs (approximately 3km of coast)**. These areas are shown in **Figure 28.17i** (APP-339) and **Figure 28.17j** (APP-340) of the ES. The effects on special qualities of the Covehithe area



of the SCHAONB coast cannot be experienced from the SCP, which is routed well inland of the cliffs (**Figure 28.24a** (APP-353)), and the effects experienced at Dunwich Heath are only experienced over a short section of the SCP (Section 6) **Figure 28.24a** (APP-353) where it crosses Dunwich Heath approaching the Coastguard Cottages at Minsmere Cliffs.

112. The significant effects on SCHAONB special qualities are therefore limited to specific locations along its length, as set out in the ES, and are not experienced continuously along the SCHAONB coastline. These effects are experienced from specific 'destination' points accessed only from minor roads extending to the coast, rather than as part of an extended coastal experience. They are experienced from specific sections of the SCP through these areas, but would not be experienced continuously from the SCP through the SCHAONB coastline, because the relevant areas are dispersed and occur in 'pockets' associated with particular areas of the coast. Furthermore, the means of accessing these areas, often the SCP, does not allow a continuous exposure to the effects, as the SCP often diverts from the coast outside these areas, passing through landscapes that have limited visibility, or landscapes where the SCHAONB special qualities are less apparent. The scenic qualities of the coast are varied and not always consistent between the different parts of this relevant stretch of SCHAONB coastline.
113. From these locations where significant effects on special qualities are likely to occur, the East Anglia TWO windfarm site will not result in any direct changes to the current pattern of elements that define the landscape character of these areas of the coastline, however the East Anglia TWO windfarm site will introduce a further element into the wider seascape setting, adding to the juxtaposition of different elements perceived from the coastal edge. Changes to the perceived character of these LCTs and the special qualities of the AONB in these areas, occur in views from them, rather than 'on' or 'within' them. The East Anglia TWO windfarm site does not affect the immediate setting of these LCTs, but will be seen on and beyond the horizon, as a 'horizon development' to a large open seascape, rather than being viewed 'within' its landscape.
114. Furthermore, the effects arise as a result of change on the particular seascape characteristic which form only part of their setting, not wholesale change on landscape character, since even within these areas where significant effects occur, there are other elements, features and aesthetic/perceptual aspects that continue to contribute to the character and distinctiveness of the LCTs that will not be changed or effected in the same way, and will continue to form the distinctive and prevailing landscape character and qualities.
115. No physical attributes that contribute to the special qualities of the AONB will be changed as a result of the construction and operation of the offshore



infrastructure. The East Anglia TWO windfarm site, due to its location at some distance outside the AONB, only impacts on the perception of certain special qualities and these are aspects of landscape and scenic quality, relative wildness and tranquillity. The effect resulting from the East Anglia TWO windfarm site is assessed as significant but as a result of combination of high sensitivity receptors with medium, rather than high magnitudes of change on the perception of specific landscape, scenic and relative wildness qualities that derive from changes to views from the AONB out to sea from geographically focused areas along the immediate coastal edges of the AONB where these panoramic, long distance views offshore are an aspect of the special quality.

116. Where significant effects to special qualities occur, i.e. at the coast in these particular geographic areas of the SCHAONB in the perception of offshore panoramic views, significance is finely balanced near the threshold of significance. The magnitude of change is of medium or medium-low magnitude on special qualities (and therefore either just 'significant' or just 'not significant') and in no cases are the impacts of higher levels of magnitude. The assessment and professional judgement took a precautionary approach in terms of the assessed significance and took on board the weight of other professional judgements expressed through the stakeholder consultations. There is agreement between the Applicant and Natural England that these are finely balanced judgements near the threshold of significance.
117. The SLVIA takes a further precautionary approach in relation to 'frequency of effect'. As described in 28.3.3.1 of **ES Chapter 28** (APP-076), the East Anglia TWO windfarm site will only be visible in 'very good' or 'excellent' visibility, since it is located at approximately 32.6km from the coast at its closest point and extends beyond 50km from the coast at its more distant points. Effects on SCHAONB special qualities will therefore also only occur in these periods of 'very good' or 'excellent' visibility which have limited frequency. Based on visibility from the closest point (32.6km), the Met Office visibility data indicates that the East Anglia TWO windfarm site will have a visibility frequency of approximately 33% i.e. 120 days of the year on average (or approximately one-third of the year) with visibility over 32.6km. Of this period of 'very good' and 'excellent' visibility, the totality of best visibility will not just occur in summer months but also during the winter and a notable portion of this very good and excellent visibility will be in periods of darkness.
118. Variations in weather, limitations on the visibility and how infrequently these effects on the special qualities of the SCHAONB will be experienced have not been downgraded either in magnitude or significance. Significant effects are assessed based on the worst-case with clear visibility. Those significant effects assessed as occurring on the special qualities of the SCHAONB therefore need





to be considered and balanced in the context of the limited amount of time that 'very good' or 'excellent' visibility out to sea will be available at the distances to the East Anglia TWO windfarm site (32.6km and over) when effects on special qualities may be experienced. In other times of less than optimal visibility (very poor, poor, moderate and good), which represent a large proportion of the visibility frequency, significant effects on special qualities of the SCHAONB are unlikely to be experienced, as the East Anglia TWO windfarm site will not be visible. It is reasonable to conclude that the prevailing visibility and weather conditions will combine to reduce the probability and frequency of significant effects on special qualities of the SCHAONB to limited periods when particularly clear offshore views are available.

119. The Applicant notes that Natural England also consider that significant effects on special qualities may occur within LCT 29 Wooded Fens, however it maintains its assessment that the effect of the East Anglia TWO windfarm site on the perceived character of LCT 29 Wooded Fens (Covehithe Broad and Easton Broad) is not significant as a whole, as set out in the ES and expanded in the **Applicants Applicant's Comments on Relevant Representations** Natural England (AS-036). While the Applicant notes the potential for localised significant effects to the perceived character of small areas of the coastal edges of LCT 29 Wooded Fens with offshore sea views, it is the Applicant's assessment that the aesthetic and perceptual aspects which define its baseline character as a low-lying wooded fen/broad will not be lost and will remain fundamental to defining its character, and therefore on balance, the perceived character of LCT29 Covehithe Broad and Easton Broad will not be significantly affected.
120. The effects on all other areas of the coastal LCTs and LCTs that lie inland are assessed as being not significant. The assessment confirms that there are no significant effects on the special qualities experienced in areas where special qualities are particularly evident, such as the pockets of marshland and estuaries associated with the Coastal Levels (LCT06) and Open Coastal Fens (LCT08).
121. The Applicant's assessment is that the magnitude of change on special qualities experienced in these landscapes is medium-low and below the significance threshold, as set out in the ES and expanded in the **Applicant's Comments on Relevant Representations** Natural England (AS-036) and the **Applicants' Responses to Natural England's Deadline 1 Submissions** (REP2-004). These areas of Coastal Levels (LCT06) and Open Coastal Fens (LCT08) do not have a direct 'coastal portion' or edge to the seascape, being entirely separated from the sea by the strip of intervening Coastal Dunes and Shingle Ridges (LCT 05), such that often the area is screened behind this raised shingle ridge which limits directs views of the sea and provide screening of the turbines within the East Anglia TWO windfarm site from the low coastal levels and coastal fens.



- 
122. The construction and operation of the offshore infrastructure will result in a relatively low change to the strong character of the AONB, with its varied and distinctive landscapes continuing to define its overall character. It is not the overall character or physical features of the coastal edges of the AONB that will be changed, but to some degree the specific aesthetic/perceptual aspects of its character from localised areas of the coast where there are interactions between these aesthetic/perceptual aspects of the sea and the East Anglia TWO windfarm site. These effects arise as a result of change on some particular characteristics, not a change to all of the characteristics since the majority of elements, features and aesthetic/perceptual aspects will continue to contribute to the character and distinctiveness of the AONB and will not be changed or affected in the same way. The perception of most of the other AONB special qualities and key characteristics will remain unaffected by the construction and operation of the offshore infrastructure.