



The Planning Act 2008

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

**Planning Inspectorate Reference: EA1N – EN010077 &
EA2 – EN010078**

Deadline 8 - 25 March 2021

**East Suffolk Council's Response to Examining
Authority's Action Points Following Issue Specific
Hearing 8**

The table below details East Suffolk Council's (ESC) response in relation to the outstanding action point raised during Issue Specific Hearing 8 (ISH8).

No.	Action Point	Party	Deadline	East Suffolk Council's Comments
ISH8 Hearing Action Points – 18 February 2021				
2	Applicant's 'think-piece'. Applicants to set out their position in respect of action 1 as a 'think-piece' by D6, to enable NE to set out its position by D7 and enable further responses including from LAs and AONB Partnership by D8.	Applicants Natural England, SCC, ESC, AONB Partnership	D6 D7 D8	ESC has provided a response which has been prepared with Suffolk County Council (SCC). The response has been set out below this table.

Response to the 'Think Piece' presented by the Applicants at Deadline 6

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

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

- The differences in character of the respective areas
- The nature of the receiving environment
- The significance and sensitivity of the coast as a component of the designation
- The relationship between the turbines and the viewer
- The seasonal visibility of the proposed developments and consequent thresholds of sensitivity on the Suffolk coastline¹ see ***Suffolk Seascape Sensitivity to offshore wind farms*** October 2020 - White Associates

Therefore, whilst the Councils again defer to the views of Natural England on this 'Think Piece', we would like to draw the Examining Authority's attention to the following issues.

¹Appendix B of *Suffolk Seascape Sensitivity to offshore Wind Farms* <http://suffolklandscape.org.uk/wp-content/uploads/2020/10/Suffolk-seascape-sensitivity-to-wind-farms-final-061020.pdf>

- 1) In Table 1 the Applicants state, under ‘Geographical Relationship with Designated Landscape’, that both the Rampion array and EA2 project are orientated ‘parallel to the coast’. Notwithstanding this apparent common thread, it should be noted that:
 - a) The coastline of the South Downs National Park (SDNP) is only about 18 Km long and is not directly offshore at the key coastal viewpoint of Beachy Head, whilst the SC&H AONB has a coastline of over 70km with EA2 directly offshore for a notable length of its designated coastline. As a result of having a significantly greater length of designated coastline, the coastal nature of the Suffolk designation and its relationship to the sea is integral to its character and special qualities, in a way that is not the case for the SDNP.
 - b) Furthermore, the majority of the SDNP is in fact separated from the coast by an undesignated and well-developed coastal strip, whereas the SC&H AONB has a direct relationship with its coastal strip and adjacent seas, and the limited built environment of the Suffolk Coast and Heaths is incorporated into the designated area, and in fact contributes to the character and special qualities and cultural associations² of the designation and the Suffolk Coast in general. These issues are discussed in detail in the local Seascape Typology available at <https://suffolklandscape.org.uk/landscape-typology/seascape-typology/> and we draw the Examining Authority’s attention to this study, which has been previously provided to the Applicants and was developed, following discussion with the Applicants, regarding the lack of local seascape characterisation material.
- 2) Paragraph 11 states that National Parks have a higher level of protection than Areas of Outstanding Natural Beauty.
 - Paragraph 5.9.9 EN-1 states that ‘National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty’. At no point does this or any other paragraph in National Planning Policy state that this status is higher in National Parks than it is in AONBs.
 - The level of protection for National Parks and AONBs is the same as both National Planning Policy and primary legislation make clear. The primary statutory purpose of both National Parks and AONBs is the ‘conserving and enhancing of natural beauty’. They are equivalent to National Parks in terms of their landscape quality, scenic beauty, and their planning status.

² s6.1 *Cultural Associations in Seascape Character Assessment: Suffolk South Norfolk and North Essex* December 2018 https://suffolklandscape.org.uk/wp-content/uploads/2020/08/Part1_5997_Assessment_V1_10_Issue_web.pdf