



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

East Anglia TWO Offshore Wind Farm

Appendix E4 to the Natural England Deadline 8 Submission

Natural England's Comments to the Applicant's 'Think Piece' [REP6-049]

For:

The construction and operation of East Anglia TWO Offshore Wind Farm, a 900MW wind farm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

25th March 2021



Natural England's Comments to the Applicant's 'Think Piece' [REP6-049]

Introduction

1. At the request of the Examining Authority following Issue Specific Hearing (ISH) 8 held on the 18th February, the Applicant provided a 'think piece' [REP6-049] in relation to Action Points 1, 2 and 5. The 'think piece' set out the Applicant's position regarding the effects of Rampion Offshore Windfarm on the South Downs National Park (SDNP) and Sussex Heritage Coast and potential effects of Navitus Bay Offshore Windfarm on the Dorset Area of Outstanding Natural Beauty (AONB), Isle of Wight AONB and Purbeck and Tennyson Heritage Coasts.
2. This document provides Natural England's comments on the Applicants 'think piece' [REP6-049].

Summary

As we set out in our comments at Deadline 6 [REP6-114], Natural England advises that it is unhelpful to make like for like comparisons between Rampion and EA2 and by association between the SDNP and Suffolk Coast and Heaths Area of Outstanding Natural Beauty (SCHAONB). As set out in this document, the visual relationship between Rampion / SDNP and EA2 / SCHAONB is fundamentally very different. **Consequently, the manner and extent of the significant adverse effect on the statutory purpose of each designation is different and unique.** For the same reason Natural England also advises that no comparison can be made between Navitus Bay Wind Park / New Forest National Park, Dorset AONB Isle of Wight AONB and EA2 SCHAONB.

Comments

1. At paragraph 9 the Applicant states that the Rampion array is 14km away from the SDNP/Sussex Heritage Coast. This is incorrect. As the Applicant correctly states, at paragraph 32, the Sussex Heritage Coast is 22.1km from the array.



2. At paragraph 11 the Applicant states that National Parks have a higher level of protection than Areas of Outstanding Natural Beauty (AONB). This is incorrect. 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*'. At 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.

3. At paragraph 13 we note that the Applicant considers the apparent height of the Rampion turbines will be '*highly comparable to those proposed for EA2*' when viewed from SDNP in the vicinity of Rottingdean. However, Natural England reminds the ExA that the mitigation measures, the 'Exclusion Zone' and Design Principals, contained within the Rampion DCO were never intended to provide benefit for this location. These measures and principals were aimed at key locations within the SDNP and Sussex Heritage Coast; Beachy Head, Birling Gap and Cuckmere Beach (see paragraphs 43 and 64). The portion of the SDNP located near Rottingdean is outside of the Sussex Heritage Coast. From Beachy Head, Birling Gap and Cuckmere Beach the apparent height of the Rampion turbines is considerably less than that calculated for EA2 at the (equally) key locations on the coastline of Suffolk Coast and Heath AONB (SCHAONB) and the Suffolk Heritage Coast.

4. In Table 1 the Applicant states, under '*Geographical Relationship with Designated Landscape*', that both the Rampion array and EA2 project are orientated 'parallel to the coast'. Whilst there is some commonality in the way these two designations align to the coast this summary omits the following key information;
 - i. the coastline of the SDNP extends to 18.1km. The coastline of the SCHAONB extends to over 70km.
 - ii. the SCHAONB is predominately a coastal landscape, the landscape of the SDNP is not. Consequently, the natural beauty is expressed very differently in the SCHAONB than it is in the SDNP.



- iii. the SCHAONB is orientated to the coastline, from Rottingdean the SDNP steady divagates away from the coastline in a north-westerly direction.
 - iv. the coastline of the SCHAONB contains few settlements (Southwold, Thorpeness, Aldeburgh) the intervening, non-designated coastal strip between the non-coastal portion of the SDNP and the sea includes the urban settlements of Newhaven, Peacehaven, Saltdean, Rottingdean, Brighton, Hove, Portslade-by-Sea, Shoreham, Lancing, Worthing, Rustington, Littlehampton, Middleton on Sea and Bognor Regis. See paragraph 49 and the reference to 'intervening landscape influences'.
 - v. views out to sea from the non-coastal portions of the SDNP also take in the above urban area views out to sea, but this only happens intermittently for SCHAONB .
5. In Table 1, under '*Identified Effects on Designated Landscapes*' the Applicant refers to 'indicators' of specific qualities' for the SCHAONB. This is incorrect. The SLIVA considered the likely effect of EA2 on some of the special qualities of the SCHAONB and not a list of signposts to these special qualities.
6. At paragraph 51 the Rampion ES concluded that 'views out to sea' were a 'defining feature' of the 'coastal extents' of the SDNP and Sussex Heritage Coast. As set out in the SCHAONB Management Plan views out to sea are also a defining feature of this designation and help define the natural beauty of the area.



EA2 Applicants Comments on Natural England Deadline 6 Submissions ExA.AS-9.D7.V1

Ref.	Natural England Response to Applicant's Comments
001	No further comment at Deadline 8
006	No further comment at Deadline 8
009	No further comment at Deadline 8
013	No further comment at Deadline 8
014 / 015 / 016	Natural England disagrees with the points made by the Applicants for the reasons already offered in previous submissions.
018	No further comment at Deadline 8
029	No further comment at Deadline 8
031	No further comment at Deadline 8
032	Natural England is unsure as to how these two sets of comments relate.
034	No further comment at Deadline 8
035	No further comment at Deadline 8