



NORTH FALLS



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*Offshore Wind Farm*

# ENVIRONMENTAL STATEMENT

## Appendix 25.4 Offshore Infrastructure Setting Assessment

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## Glossary of Acronyms

AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
BEIS	Department for Business, Energy and Industrial Strategy
BOP	Battery Observation Post
DCO	Development Consent Order
DLUHC	Department for Levelling Up, Housing and Communities
HES	Historic Environment Service
EIA	Environmental Impact Assessment
EN-1	Overarching National Policy Statement for Energy
ES	Environmental Statement
ETG	Expert Topic Group
GGOW	Greater Gabbard Offshore Wind Farm
GIS	Gas Insulated Switchgear
HER	Historic Environment Record
MHCLG	Ministry of Housing, Communities and Local Government
MHWS	Mean High Water Springs
NFOW	North Falls Offshore Wind Limited
NHLE	National Heritage List for England
NHRE	National Record of the Historic Environment
NPPF	National Planning Policy Framework
PEIR	Preliminary Environmental Information Report
PPG	Planning Practice Guidance
RAF	Royal Air Force
SLVIA	Seascape, Landscape and Visual Impact Assessment
WTG	Wind Turbine Generators
ZTV	Zone of Theoretical Visibility

## Glossary of Terminology

The Project or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.
The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
Array cables	Cables which link the wind turbine generators with each other, the offshore substation platform(s) and/or the offshore converter platform.
Landfall	The location where the offshore export cables come ashore at Kirby Brook
Offshore cable corridor	The corridor of seabed from array areas to the landfall within which the offshore export cables will be located.
Offshore export cables	The cables which bring electricity from the offshore substation platform(s) to the landfall, as well as auxiliary cables.
Offshore project area	The overall area of the array areas and the offshore cable corridor.
Offshore substation platform(s)	Fixed structure(s) located within the array area, containing HVAC electrical equipment to aggregate the power from the wind turbine generators and increase the voltage to a more suitable level for export to shore via offshore export cables.
Wind turbine generator	Power generating device that is driven by the kinetic energy of the wind.

## 1 Introduction

1. This report presents the results of an assessment of the predicted effects of from the offshore infrastructure for North Falls Offshore Wind Farm (hereafter 'the Project') both individually and cumulatively, on the heritage significance of coastal onshore designated heritage assets resulting from change in their setting.
2. This assessment builds on a scoping appraisal presented in Annex 25.4.2 following Section 42 consultation responses from Historic England on the Preliminary Environmental Impact Assessment Report (PEIR) and subsequent discussions at the Expert Technical Group (ETG) meeting on the 8 November 2023. Further detail on this consultation is presented in Annex 25.4.2 Offshore Infrastructure Settings Scoping Appraisal.
3. Through the scoping assessment (Annex 25.4.2) 52 designated heritage assets were identified within the study area, whose significance derived from factors that might interact with visibility of the proposed development may be affected by changes to their setting. These are identified on Figure 1 (Annex 25.4.1). Following study of the settings of these assets, it was determined that a total of 13 scheduled monuments, 17 listed buildings, one conservation area, one Registered Park and Garden would potentially be affected by the presence of the Project within the seascape and therefore would require a full detailed setting assessment. It should be noted that the majority of these assets have duplicate designations, containing both listed building entries and scheduled monuments. For the purposes of the assessment, the highest valuation applicable to these heritage assets has been used to establish the significance of any effect in Environmental Impact Assessment (EIA) terms.
4. This report therefore presents a detailed assessment of the predicted change to the heritage significance of the 13 scheduled monuments, 17 listed buildings, one conservation area, one Registered Park and Garden through changes to their setting arising from the operation of the Project.
5. Consultation with stakeholders relevant to this report is detailed in Annex 25.4.2.

## 2 Relevant guidance

6. A requirement for the assessment of impacts to heritage significance as a result of change in the setting of heritage assets is described in planning policy, including the National Planning Policy Framework (NPPF) (DLUHC, July 2021) and associated Planning Practice Guidance (PPG): Historic Environment (DLUHC and MHCLG, July 2019). Overarching National Policy Statement for Energy (EN-1) (DESNZ, 2023), the primary decision-making policy associated with nationally significant energy projects, including offshore windfarms and associated onshore electrical connections, also addresses the subject of the setting of heritage assets. These documents outline the importance of assessing heritage assets in a manner appropriate to their significance, and the contribution to significance associated with an asset's setting, to better understand the potential impacts and effects (in EIA terms) and ultimately acceptability of development proposals in this regard.

7. Industry standard guidance recommended by Historic England, in Historic Environment Good Practice in Planning Note 3: The Setting of Heritage Assets second edition (Historic England, 2017), defines setting as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of an asset's setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral.
8. Historic England's guidance also states that the settings of heritage assets change over time. Understanding the history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset.

### **3 Summary of previous assessment**

9. An initial scoping assessment of designated assets whose setting could be affected by the Project has been undertaken, which is presented in Annex 25.4.2. This constitutes step one of GPA 3 (Historic England, 2017) outlined in Section 5.

### **4 Proposed offshore infrastructure**

10. The assessment is based on an understanding that the appearance of the setting of the identified heritage assets will change as a result of the construction and operation of the Project.
11. North Falls is a proposed extension project located west of the existing Greater Gabbard Offshore Wind Farm (GGOW) array. The array boundary covers an area of approximately 95km<sup>2</sup>, respectively. At closest point, the boundary is approximately 40km from shore. The site boundary is shown on Figure 5.1 (Document Reference: 3.2.3).
12. Conventional three bladed, horizontal axis Wind Turbine Generators (WTGs) will be used. A number of options for the WTGs, including the size, are being considered. The maximum blade tip height would be 377.4m above Mean High Water Springs (MHWS).
13. Further details regarding the offshore infrastructure are provided within Chapter 5 Project Description of the Environment Statement (ES) (Document Reference: 3.2.3).

## **5 Methodology**

### **5.1 Scoping assessment**

14. An initial Seascape, Landscape and Visual Impact Assessment (SLVIA) Zone of Theoretical Visibility (ZTV) has been produced for the offshore infrastructure based on a 60km study area which includes parts of the outer Thames estuary, Suffolk, Essex and Kent (Chapter 29 Seascape, Landscape and Visual Impact Assessment, Document Reference: 3.2.25).

15. An initial scoping of the heritage assets which fall within the SLVIA ZTV and where changes to their setting could occur as a result of the offshore infrastructure has been undertaken. The heritage assets which may experience a change in their setting are presented in (Table 4.1 in Annex 25.4.2 and shown on Figures 1c, 1d and 1e, Annex 25.4.1).
16. A site visit was conducted on 6<sup>th</sup> October 2022 with the aim to provide initial setting assessment information of the identified heritage assets within a smaller study area between Walton-on-the-Naze and Clacton-on-Sea. This initial study area is based on those coastal heritage assets located nearest to the offshore array area (Figures 1c, 1d, 1e, Annex 25.4.1).
17. Records of designated heritage assets were obtained from the National Record of the Historic Environment (NHRE) and the National Heritage List for England (NHLE) online (<http://www.historicengland.org.uk/listing/thelist/>) maintained by Historic England.
18. Records of non-designated heritage assets were obtained from Essex Historic Environment Record (HER), including records of previous archaeological surveys and investigations (events).

## 5.2 Setting Assessment

19. This setting assessment is undertaken in accordance with the Historic England advice presented in Historic Environment Good Practice in Planning Note 3: The Setting of Heritage Assets second edition (Historic England, 2017). This recommends a staged approach to the assessment of potential impacts on heritage significance, comprising the following five steps:
  - Step 1:** Identify which heritage assets and their settings are affected (i.e., screening assessment outlined above).
  - Step 2:** Assess the degree to which these settings make a contribution to the heritage significance of the heritage asset(s) or allow heritage significance to be appreciated.
  - Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on that heritage significance or on the ability to appreciate it.
  - Step 4:** Explore ways to maximise enhancement and avoid or minimise harm.
  - Step 5:** Make and document the decision and monitor outcomes.
20. The scope of this setting assessment is defined in terms of its geographical extent and the types of heritage asset to be considered within the chosen study area.
21. The terrestrial elements of the study area encompass a wide variety of historic seascapes, comprising the dynamic shingle landscape of the East Suffolk Coast, the ports of the Deben, Stour and Orwell estuaries and the low cliffs and sandy beaches of the shore of the Tendring Peninsula. The study area also includes the Isle of Thanet, with its historic ports and resort towns.
22. The main asset types considered as part of this initial setting assessment were:
  - Coastal defences;
  - Sea Marks and lighthouses

- Seafront conservation areas
  - Lookouts and maritime features
23. **Step 1** concluded that a total of 13 scheduled monuments, 17 listed buildings, one conservation area, one Registered Park and Garden may be affected by the Project and therefore merited further assessment in **Steps 2 to 4**. These are:
- The chain of Martello Towers between Slaughden (Aldeburgh) and Jaywick (Please see below for NHLE references);
  - Orford Castle (NHLE 1014860/1030873);
  - Battery Observation Post, Bawdsey (NHLE 1389463);
  - Bawdsey Manor Registered Park and Gardens (NHLE 1001465) and Bawdsey Manor Pulhamite Cliffs (NHLE 1406805);
  - Landguard Fort (NHLE 1018969/1030415);
  - Naze Tower (NHLE 1165846); and
  - Clacton Seafront Conservation Area.
24. **Step 2** (the degree to which setting contributes to the heritage significance of the asset) involved desk-based research, site visit (October 2022) and the use of SLVIA wireframes, offshore visualisations, and photomontages of assets progressed past Step 1. In each case, written statements describe their heritage significance with a focus on the contribution made by their setting.
25. **Step 3** (impact of the proposed development). It has been determined that only changes in setting due to the operation of the Project would be of sufficient duration to merit assessment as impacts during construction and decommissioning would be temporary and not long lasting. As such, construction and decommissioning have not been assessed.
26. Visibility to seaward is considered to be the only aspect of setting that would be changed in ways that could affect heritage significance as the distance of the Project's array area from the assets means that other perceptual changes would not occur. The presence of the offshore infrastructure in the seascape has the potential to change the appearance and character of the setting, as well as changing specific views within these settings that contribute to the heritage significance of the assets. It is this latter point that is critical. Visibility of the proposed turbines and indeed visual incongruity would not necessarily equate to an adverse effect where the heritage interests of the asset were not affected. Understanding of the predicted visual changes in the setting of the 33 assets has been informed by the production of photomontages and viewpoints.
27. Conclusions in **Step 3** regarding the effects of the Project has been expressed in terms of the magnitude of impact (harm) to the heritage significance of heritage assets, applying the magnitude criteria set out in Chapter 5 EIA Methodology of the ES (Document Reference: 3.2.3). Magnitude of impact has also been expressed using the vocabulary of the Overarching National Policy Statement for Energy (EN-1) and the NPPF (i.e., 'substantial' and 'less than

substantial' harm) to permit direct application to the policy tests in these documents.

28. **Step 4** (maximise enhancement, minimise harm) involved dialogue with other members of the project team (including the Seascape and Visual Impact specialists) and the ETGs to ensure relevant assets were identified and sufficiently assessed.
29. **Step 5** (decision-making and monitoring). This report concludes no further mitigation measures are required.

## 6 Results

### 6.1 The chain of Martello Towers between Slaughden (Aldeburgh) and Jaywick

30. The chain of Martello towers spans between Slaughden and Jaywick and form part of a group of small defensive forts built between 1810 and 1812 on the east coast of England in lieu of a Napoleonic invasion threat from Europe.
31. Along the East coast of Essex and Suffolk there were originally 29 Martello towers built between 1808 and 1812. These towers stretched from St Osyth in Essex to Aldeburgh in Suffolk. All the towers had an associated parcel of land, sometimes as large as 4 ha (Historic England 2007). The specific use of the land around a Martello tower varied, but it generally included space for additional defensive structures, barracks for soldiers and storage facilities for ammunition and supplies. The fortifications were designed and positioned to protect vulnerable beaches and strategic positions such as river mouths and harbor entrances along the coast.
32. The generally accepted interpretation of these defenses is that they were intended to protect the close approaches to key harbours or landing places that were vulnerable to raiding by smaller groups or more significant invasions by larger forces to delay landings sufficiently to allow a mobile force to intercept (Clements 1998). Defence at a distance was always planned to be by the Royal Navy, and any sense of fire control or look out was over a relatively limited range; the muzzle loading guns mounted would typically have had an extreme range of around 1 to 2 miles (up to 3km), with an effective range much less. With limited inland signalling (a semaphore system was operation between London and Great Yarmouth at this time, but was never used to connect the east coast Martellos), any role as an early warning network was limited; the maximum distance at which a ship of the line would have been visible from the top of the Martello would theoretically have been slightly over 40km, but in practice this would only have allowed visibility of the very tops of the masts of a ship of the size of HMS Victory (assuming a mast height of 70m) in excellent conditions, and the effective distance at which a vessel could be identified significantly closer.
33. The spacing of approximately 800m in key locations gives a good guide as to the area designed to be directly controlled by each site; longer gaps between forts tend to relate to demolition, loss to coastal erosion or the areas being considered unsuitable for landing sizeable bodies of troops; notably the



complete absence of Martellos in the coastal marshes of the Colne, Blackwater and Crouch estuaries.

34. The forts were built in a generally consistent style at around 12m tall with thick masonry walls of rendered brick around 2.4m thick. The top floor was open to the sky and supported by a large central pillar. The top floor acted as a gun platform for fixed artillery pieces or a cannon that could traverse a 360° arc. Some towers were supported by forward batteries, and many were surrounded by brick or stone-lined dry and/or water-filled moats crossed by bridges or drawbridges.
35. The majority of Martello towers are designated as scheduled monuments also as listed buildings at varying grades. They derive their significance predominantly from historical and architectural value as good surviving examples of this latest stage of gunpowder fortifications, as well as their illustration of strategic and tactical military planning during the Napoleonic Wars, reflecting and reinforcing wider concerns about Britain's relationship with Europe. They form a coherent group value being built at the same time and as part of a cohesive network of forts providing an integrated defensive system. This is particularly relevant where the original towers still neighbour each other allowing the viewer to appreciate the tactical relationship between these defenses as they were intended. In other areas this ability to understand tactical function has been diminished or lost by later buildings being crowded near to the towers, and here the towers survive more as intriguing reminders of former conflict within the modern landscape. In some cases, these towers interact with later defensive or maritime structures, reinforcing their historical interests.
36. The characteristics of the individual sites are outlined below along with discussions to the contribution of setting to their significance and likely impacts of the Project.

#### 6.1.1 Heritage significance and contribution of setting to the chain of Martello Towers

##### 6.1.1.1 Martello tower / Martello Tower (Scheduled Monument & Grade II\* Listed Building, NHLE 1006041/1269724)

37. This Martello Tower is the most northerly in the chain, located 1.5km to the south of Aldeburgh on a narrow section of land between Aldeburgh Bay and the River Alde. The tower is also the largest in the chain, being quatrefoil in plan and surrounded by a deep moat.
38. The asset is situated in a coastal area which demonstrates a relative lack of modern development, adding to the appreciation of the asset within its original setting. The seaward extent of the moat is no longer extant having been eroded by the sea, but the main section of the tower appears in good condition, now in use as holiday accommodation.
39. Setting contributes to the significance of this asset through:
  - The limited modern development in the area adds to the viewers ability to better understand its tactical operation and makes it easier for the viewer to imaginatively reconstruct the past appearance of the tower.



- The functional connection and uninterrupted visibility out to sea can still be understood, although coastal erosion has resulted in the tower being positioned and partially buried in the edge of a modern sea wall.
- Views to the south over the Orford Ness Atomic Weapons Research Establishment and the massive cranes at Felixstowe docks, and to the north over Aldeburgh and to the Sizewell Nuclear Power Stations contribute to an understanding of the past, continuing and changing strategic significance of this part of the east coast of England.

*6.1.1.2 Martello tower at Shingle Street/ Martello Tower (Scheduled Monument and Grade II Listed Building NHLE 1006034/1183230)*

40. This Martello tower is located at Shingle Street beach, north of Felixstowe at the mouth of the River Alde. The tower comprises three storeys and follows a tear-drop shaped plan, with the sharper end oriented eastward, facing the sea suggesting a designed field of fire north to protect the River Alde estuary.
41. There are several small residential dwellings located in the vicinity around the tower, but these are sparsely placed and respect the former extent of the tower's moat and outer counterscarp bank defences which can still be understood as slight earthworks.
42. There are several 20<sup>th</sup> century modifications to the tower including a modern door, a large cambered-headed window on the ground level, along with adjustments to four first-floor window openings, which now feature projecting ashlar surrounds. A west-facing doorway with an ashlar surround and an inset ladder-slope was introduced at the same level, accessible by 20th-century concrete steps. Lastly, a contemporary glazed porch has been added to the roof.
43. The tower still can be recognised as a dominant feature of Shingle Street, contributes to the viewers' understanding of the past and continuing strategic significance of this part of the east coast of England. In modern history Shingle Street beach has been subject of persistent speculation, notably relating to events in World War II. One theory suggests that the beach was strategically chosen as the site for a staged invasion hoax by the British government with the objective of misdirecting German forces away from the actual intended invasion site along the East Anglian coastline. Supposed deliberate suppression of information related to Shingle Street, has fostered an atmosphere of secrecy surrounding historical events which has led to persistent conjecture relating to the potential existence of undisclosed military operations or experimental undertakings in the vicinity of Shingle Street Beach.
44. Setting contributes to the significance of this asset through:
  - The ability to appreciate the tower in its original context including its strategic position defending the mouth of the River Alde which would have comprised its primary area of control.
  - The tower holds a functional connection and uninterrupted visibility out to sea and up and down the coast which can still be readily appreciated along with views towards the tower which still remains a dominant feature in the landscape.

- The tower has a historical connection and direct intervisibility with the Martello Tower at Buckanay Farm 780m to the south.

6.1.1.3 *Martello tower SE of Buckanay Farm/ Martello tower at TM 361 419 (Scheduled Monument and Grade II Listed Building, NHLE 1006014/1030773)*

45. This Martello tower is located within agricultural fields 450m southeast of Buckanay Farm at Alderton.
46. This tower comprises three stories and follows a tear-drop-shaped plan, with the sharper end facing eastward towards the sea. The tower's roof hosts a gun emplacement dating from approximately 1939 to 1945, constructed of reinforced concrete, characterised by a projecting centre and recessed flanking walls with gun slits.
47. There is limited modern development around this tower with it being situated within agricultural fields. The isolated position of the tower provides a sense of time depth with the tower's overgrown vegetation, weathered stone and remoteness conveying a sense of historical depth, connecting the present with the past. The extent of the original associated compound land around the tower cannot be readily appreciated by the viewer due to the encroachment of this farmland.
48. Setting contributes to the significance of this asset through:
  - A functional connection and uninterrupted visibility out to sea and to Shingle Street beach to the north can still be appreciated.
  - The ability to appreciate the sense of remoteness and romanticism of ruin of the tower within a modern agricultural landscape.
  - A historical connection and intervisibility with the Martello Towers at Shingle Street which is located 780m to the north and Bawdsey Beach 920m to the south.

6.1.1.4 *Martello tower by Bawdsey Beach/ Martello tower at TM 358 (Scheduled Monument/Grade II Listed Building NHLE 1006015/1183138)*

49. This Martello tower is located at Bawdsey Beach 935m to the south of tower at Buckanay Farm. It is situated in an arable coastal landscape with clear views towards the sea and back towards the Buckanay Farm tower.
50. The tower is similar in design to the aforementioned towers however the Bawdsey beach tower is built in yellow brick. The tower is now in use as a holiday apartment rental propriety with modern additions to the roof and has a metal staircase accessing the main doorway.
51. Setting contributes to the significance of this asset through:
  - A functional connection and uninterrupted visibility out over Hollesley Bay can still be appreciated.
  - The lack of modern development within the immediate rural and coastal area allows the viewer (particularly from Buckanay Lane to the south) to better understand its tactical operation and makes it easier for the viewer to imaginatively reconstruct the past appearance of the tower.

- A historical connection and intervisibility with adjacent Martello Towers at Buckanay Farm 920m to the north and Rose Cottage 1.3km to the south.

*6.1.1.5 Martello tower at Rose Cottage/ Martello tower adjacent to Rose Cottage (Scheduled Monument /Grade II Listed Building, NHLE 1002969/1377188)*

52. The Martello tower at Rose Cottage is located to the east of Bawdsey. There are two small cottages located to the north of the tower and a large rock seawall located to the east.
53. The sea defences have extended around the seaward side of the headland with more than half of the towers original land parcel appearing to have been lost to coastal erosion. The bay to the south of the tower is experiencing accelerated erosion in comparison to the protected area, suggesting a potential impact on the stability of the tower. The tower is presently used as a residence and is in overall good condition. The ditch around the base of the tower is still noticeable as a slight earthwork.
54. Setting contributes to the significance of this asset through:
- The functional connection to the defence of the River Deben to the south and Shingle Street beach to the north can still be appreciated.
  - The ability to appreciate the sense of remoteness of the tower within a modern landscape can still be appreciated with a lack of modern development within the wider area. The encroachment of the sea as a result of coastal erosion is a notable detractor from this.
  - The historical connection and intervisibility with adjacent Martello Towers at of Bawdsey Beach (1.3km to the north) and wider relationship with later defensive structures such as the WWI Battery Observation Post and gun emplacement to the north reinforces its historical interest.

*6.1.1.6 Martello tower at Felixstowe Ferry/ Martello Tower, Felixstowe Ferry (Scheduled Monument/Grade II Listed Building NHLE 1002968/1377365)*

55. This Martello tower is located at Felixstowe Ferry on the south bank of the River Deben. The tower is situated within a private garden and is surrounded by residential developments including beach huts to the south, a cottage to the west and a costal footpath immediately to the west.
56. Approximately half of the original land parcel has been lost due to coastal erosion, with the other half falling within the residential garden. The tower itself is in good condition and serves as a house.
57. Setting contributes to the significance of this asset through:
- The towers functional connection and uninterrupted visibility out to sea and more importantly the view over the River Deben estuary (which would have been its area of primary control) can still be appreciated.
  - The asset can be appreciated within the context of the defence of the River Deben and its prominence in views looking towards Felixstowe Ferry from the sea likely serves as a landmark features for users of the Felixstowe Ferry Marina.

- A historical connection and intervisibility with adjacent Martello Tower at Woodbridge Haven located 700m to the south and Bawdsey Manor north across the Deben estuary.

*6.1.1.7 Martello tower on golf course adjoining Woodbridge Haven/ Martello Tower, South end of golf links (Scheduled Monument /Grade II Listed Building NHLE 1006036/1030405)*

58. This Martello tower is located on Felixstowe Ferry Golf Club to the south of Felixstowe Ferry. The landscaping associated with the golf course has disturbed the original compound area around the tower and limits the viewers experience of the asset to the tower itself. The lack of built form around the tower adds to the appreciation of the architectural value of the asset along with the overgrown vegetation, weathered stone, and prominent position on the golf course conveys a sense of historical depth, connecting the present with the past. Setting contributes to the significance of this asset through:
- The asset can be appreciated within its defensive context of securing the River Deben to the north and Felixstowe to the south which would have been its primary area of control.
  - A historical connection and intervisibility with adjacent Martello Tower at Felixstowe Ferry (700m to the north) and Bawdsey Manor across the Deben estuary. This is particularly notable in views from Ferry Road to the east where vistas of the tower the Felixstowe Ferry tower and Bawdsey Manor can be achieved.

*6.1.1.8 No 14 (The Q Tower) (Grade II Listed Building, NHLE 1030375)*

59. This former Martello tower is located within a residential area on South Hill Road in Felixstowe. The tower (which has now been converted to a residential dwelling) is in good condition, the dry moat walls also survive well and now enclose the gardens of the converted tower.
60. The area around the tower comprises a built-up townscape of mainly residential dwellings in the immediate vicinity. Whilst it still holds views across towards the sea, the intrusion of larger buildings such as the Felixstowe leisure centre encroach on this view, and limit reduce the ability to appreciate its functional role as area of control/lookout.
61. Modern developments around the asset respect its former limits allowing the viewer to appreciate the original immediate setting of the tower, although it is noted as having been converted to a residential dwelling. The current setting of the tower within a densely developed area offers limited opportunity to appreciate the function of the tower within a comprehensive defensive network feature with intervisibility between towers to the north and south.
62. Setting contributes to the significance of this asset through:
- The functional connection to the sea can still be appreciated, however it is noted that several of the larger intervening buildings within Felixstowe intrude on this view.
  - The viewer can still appreciate the historical extent of the towers immediate land holding including the moat with modern roads and developments respecting its original compound extent.

*6.1.1.9 Martello tower at western end of sea front/Coastguard Station (Scheduled Monument/Grade II Listed Building NHLE1006013/1284281)*

63. This former Martello tower is situated within Martello Park in the south-west of Felixstowe. There is modern residential development around the tower to the north, south and west, with the tower located in a grassy section of parkland with clear views out to sea across the promenade.
64. The tower has been subject to modern modifications and now serves as a coastguard building. The tower holds historical group value with Languard Fort to the south, however there is no longer a recognisable visual connection to the fort or either the Q tower or the Bartlet Hospital tower to the north.
65. Setting contributes to the significance of this asset through:
- There is a historical association with Languard Fort to the south however a mixture of modern residential developments, holiday parks and a rail freight terminal sever any visual connection.
  - The tower has influenced the modern townscape around the with residential dwellings respecting its former limits and many local guesthouses taking the name with 'Martello Dawn' and 'Martello Sunrise' as well as Martello Park to the north.
  - The functional connection and uninterrupted visibility out to sea can still be appreciated. The principal views towards the sea would have been the short to medium range views and with Languard Fort to the south and the other Felixstowe Martello Towers to the north.
  - The location within a semi open parkland does allows the user to appreciate what would have been the immediate historical extent of the compound the tower would have been situated in, to an extent, however no above ground remains are visible.

*6.1.1.10 Martello tower F, Marine Parade West, Clacton-on-Sea/Martello Tower and brick lined moat (Scheduled Monument / Grade II Listed Building NHLE 1016555/1111520)*

66. This Martello tower is located within a developed garden in Clacton-on-Sea immediately to the north of Marine Parade Way. The tower and associated dry moat appear in good condition. The Clacton and District Hospital is located to the north and east of the tower.
67. The tower has taken on various roles since its original purpose as a Napoleonic era defensive fortification. These include a coastguard station (the lookout post still survives on top of the tower), a museum run by the local Royal Navy Auxiliary Service, and as a restaurant. The tower is currently in use as a children's petting zoo with a café inside the tower.
68. The tower holds clear views out to sea with visibility of current windfarms in long views and Clacton Pier to the north-east.
69. Setting contributes to the significance of this asset through:
- The functional connection to the sea can still be appreciated to an extent, it is noted that the visibility of Clacton Pier and looking across a busy road to

the south does detract from this. Looking towards the tower the mixture of soft landscaping (hedges and trees) around its perimeter and the coastguard station lookout on top of the tower blends the tower into the modern streetscape and takes away from the viewers ability to imagine its historical purpose.

- The viewer can still appreciate the historical extent of the towers immediate land holding including the moat with modern roads and developments respecting its original compound extent.

6.1.1.11 *Martello tower D, 450m SSW of the Club House, Clacton Golf Course/Martello Tower, adjacent to sea wall Clacton Golf Course (Scheduled Monument/Grade II Listed Building, NHLE 1016553/1111524)*

70. This Martello tower is located on the southern limit of Clacton Golf Course to the southwest of Clacton. A cycle path runs between the tower and the sea wall to the south. The landscaping associated with the golf club and cycle path has resulted in the loss of the towers associated compound and immediate original setting.

71. Setting contributes to the significance of this asset through:

- The functional connection and uninterrupted visibility out to sea can still be understood. The key views out to sea would be limited to the area it can physically control by artillery (c. 3km).
- There is a historical connection and intervisibility with the Martello tower F 680m to the north-east as well as other towers within Clacton as part of a planned defensive network.
- The lack of built form around the tower also allows the viewer to appreciate its architectural interest looking out across the golf course and from the cycle/footpath that runs to the south.

6.1.1.12 *Martello tower C, St Osyth Beach, Clacton-on-Sea/Martello Tower (Scheduled Monument/Grade II Listed Building, NHLE 1018954/1165569)*

72. This Martello tower is located within a former caravan park at Jaywick Sands. There are caravan parks to the north, east and west.

73. The immediate area around the tower appears to be a cleared caravan park with the concrete pads still visible. There are no visible upstanding remains of the original associated compound area of the tower.

74. The tower guarded a sluice, which, in case of invasion, could be opened up to flood the surrounding marshes. The sluice has since been infilled and replaced with modern drainage; however the historical course can still be appreciated running north from the east of the tower.

Setting contributes to the significance of this asset through:

- The functional connection and uninterrupted visibility out to sea can still be appreciated. Key views out to sea relate primarily to the area under fire control of the fort's artillery (c. 3km) and to a visual range of around 30km.
- The functional historical and strategic connection to the sluice to the northwest which can still be appreciated.



### 6.1.2 Predicted change to setting and heritage significance of the chain of Martello Towers

75. As discussed in Section 6.1 the significance of these towers is largely derived from their historical and architectural interest. The contribution of setting to each Martello tower is outlined in Section 6.1.1 with the overall key contributors of setting to heritage significance are summarised below:
- Uninterrupted views out to sea have been identified as a key component of most of the towers' settings, this would have been limited to a localised area of control via cannon and small arms fire which would have unlikely exceeded around 2km; more distant visibility would have contributed, but primarily in the range up to around 30km from shore.
  - The role the individual towers played in a wider organised defensive structure can be appreciated through intervisibility which allows these functional relationships with nearby towers and positional relationships with key defensible features such as river mouths, harbors and towns to be understood.
  - In some cases, the historical military area around the towers can be readily appreciated either as above ground remains or modern development respecting historical limits, which adds to the understanding of the tower although in many cases this context is lost under modern development or agriculture.
  - Where modern development is limited in the surrounding area it allows the towers to be understood in their original context as landmark features.
76. The proposed turbines will be visible as distant elements in the background of views from the Martellos and to a lesser extent in views of the Martellos from ground level. This visibility would be possible to varying degrees dependent on distance and weather conditions, but generally would only be available in excellent conditions (Figure 1a-b, Annex 25.4.1). The proposed turbines would not be visible in the views to the areas of the sea intended to be controlled or surveyed by the garrisons of the Martellos, as such, while visibility of turbines may be considered in some way incongruous, it would not affect any contribution of the settings of the towers to their heritage interests.
77. In all cases, this visibility would be significantly beyond any area previously controlled or surveyed by these forts, and the sense of localised dominance and control conveyed by their form and the open view would not be challenged or diminished.
78. Similarly, the visibility of the Project would not alter the ability to appreciate the tower's role in an organised defensive system, positioned to defend key elements of the coast or impact on the immediate context of the towers where the historical compound or their position in modern townscape can still be appreciated.
79. The contribution of the urban Martellos to townscape would similarly be unaffected by very distant visibility of turbines in sequential views in which the viewers' attention is focused on the contrasts between the military structures

and the more recent domestic, commercial and leisure development. Similarly, the proposed turbines would not appear with sufficient prominence or scale to affect any sense of these structures as landmarks or focal points in the landscape, nor even any sense of remoteness or isolation.

80. Overall, no direct changes will occur to those elements which contribute to the significance of these Martello Towers, either as individual features or as a coherent group of contemporary and functionally connected heritage assets, as discussed above. As such, there would be no discernible change to the heritage significance of any of the Martello Towers discussed above.

## **6.2 Orford Castle with adjoining quarry and remains of 20th century look-out post (Scheduled Monument and Grade I Listed Building NHLE 1014860/1030873)**

### **6.2.1 Heritage significance and contribution of setting**

81. Orford Castle is located on the western side of the town of Orford, commanding views over the coastal marshes and the estuary of the River Ore to the south and southeast. The monument encompasses the 12th-century tower keep, the sole standing masonry structure, along with surrounding earthworks and buried remnants of associated structures. An adjacent quarry, also included in the scheduling, is believed to be the source of some construction material for the keep.
82. The castle keep (designated as a Grade I Listed Building), stands on a sub-circular platform approximately 50m in diameter, initially supporting a defensive wall with mural towers. Encircling this platform are remnants of two ditches with a central bank, accompanied by a smaller counterscarp bank on the west and southwest sides. Additional earthworks, possibly related to castle defences, are discernible to the southwest, alongside the quarry to the south and west. The castle and its associated earthworks span an area of approximately 163m northwest to southeast and 202m northeast to southwest, with the quarry extending an additional 100m to the southwest.
83. The castle was constructed by Henry II between 1165-66 and 1172-73, as documented in the Pipe Rolls (maintained by the Exchequer or Treasury), the castle served as a royal stronghold and coastal defence against local magnates. Additionally, it safeguarded the medieval port of Orford until the obstruction caused by the shingle spit of Orford Ness. The castle retained significance during political upheavals in the 12<sup>th</sup> and 13<sup>th</sup> centuries, changing hands during various conflicts. Its importance waned in the early 14<sup>th</sup> century, and in 1336, Edward III granted it in perpetuity to Robert de Ufford, later Earl of Suffolk. The castle was almost demolished in 1805 and was only saved as it made a useful landmark for ships arriving from Holland to navigate by. The castle is currently under the care of the Secretary of State.
84. The castle itself is designated as Grade I Listed Building with the wider area designated as a Scheduled Monument. The castle holds a wide range of architectural, historic, and archaeological interest. The keep of Orford Castle is one of five medieval royal castles in Norfolk and Suffolk and represents a remarkably intact example of its type and era, exhibiting minimal alterations subsequent to its original construction. Notably, it is considered among the



earliest polygonal tower keeps, deviating from the prevalent square plan of earlier English castles, and its design displays unique characteristics. Constructed in the third quarter of the 12th century, the castle's historical documentation is comprehensive, encompassing details of its subsequent maintenance as a royal stronghold. The enduring prominence of the castle in the local landscape reflects its original symbolic, military, and administrative functions. Both internal and external features offer valuable insights into the organisational aspects of such castles and the lives of their occupants.

85. Despite modifications due to later quarrying, the earthworks surrounding the keep remain impressive and are likely to preserve archaeological evidence, including remnants of walls and towers depicted in early illustrations of the castle. The existence of a well-preserved contemporary quarry adjacent to the castle, believed to be the source of some construction materials, adds to its significance. As a publicly accessible site, the castle serves as a valuable educational and recreational resource for both residents and visitors.
86. The castle stands as a landmark feature within Orford, along with the Church of St Bartholomew whose chancel to the original church was built at about the same time as the castle and demonstrates a similar grandeur.
87. Setting contributes to the significance of this asset through:
  - Orford Castle was strategically positioned to command views over the coastal landscape and the River Ore estuary. This allowed for effective defence against potential maritime threats and provided control over important waterways. Following construction of the castle it is noted that the surrounding marshland was drained turning Orford into a sheltered port.
  - The prominent position of the castle in the local landscape conveyed a strong symbolic authority. As a royal castle, it represented the Crown's presence and power in East Anglia, serving as a visible reminder of royal authority to the local populace.
  - The castle's immediate context, comprising the surrounding earthworks and nearby quarry, provides an archaeological context that aids in understanding its construction, maintenance, and historical context.
  - Distant visibility of Orford Ness Atomic Weapons Research Establishment provide a sense of the continuing strategic importance of this part of the coast and a sense of mystery that reinforces the effect of legends such as that of the Orford Wildman.
88. As such, the setting of the monument contributes to its heritage significance as it can be appreciated as a visible and relatively well understood example of a medieval castle.

### 6.2.2 Predicted change to setting and heritage significance

89. As outlined above, the castle has far-reaching views over the River Ore estuary and further afield towards the sea to the east. While the proposed turbines will be visible from the castle, they are located c. 42km to the southeast and as such will be difficult to discern on the horizon even in very good visibility (Figure 1b, Annex 25.4.1). The proposed turbines would appear largely behind existing

wind turbine arrays in the distant background of views from the castle to the River Ore estuary, and the prominent position within the local landscape and significance it draws from its immediate environment such as its associated earthworks will remain unaffected by the Project.

90. No direct physical changes will occur to the heritage significance of the monument, and visible changes to its setting would not affect the contribution of that setting to its significance. As such, there would be no change to the heritage significance of the monument.

### **6.3 Battery Observation Post, Bawdsey (Grade II Listed Building, NHLE 1389463)**

#### **6.3.1 Heritage significance and contribution of setting**

91. The Battery Observation Post (BOP) is located to the east of Bawdsey set adjacent to East Lane. It was built as an observation post for a coastal battery in 1940. Constructed of reinforced concrete, this two-storey building features a balcony at the first-floor level, accessed by steps, and a cantilevered roof providing a sea-facing vantage point. The ground floor, housing the entrance immediately below the balcony, includes a wide opening. The upper storey accommodated high-precision range finders, serving as a central communication hub with searchlight positions and guns. A Barr and Stroud range finder occupied the lower part of the structure.
92. The observation post served as the operational focal point for the Emergency Coastal Defence Battery, part of a network established in 1940 to enhance protection for harbour installations. The BOP coordinated activities with gun emplacements on the upper shoreline approximately 100m to the east and mobile guns stationed in the marshes. The BOP provided visual recognition of threats and used visual rangefinders to coordinate defensive actions.
93. The asset is designated as a Grade II Listed Building and draws its significance predominantly from its historical interest. The structure forms an integral part of one of the most complete 20<sup>th</sup> century coastal batteries in existence, being one of seven surviving emergency batteries in Britain. It contributes to the historical context of Britain's reinforcement of coastal defences during the early stages of World War II. Additionally, it forms a crucial component of a wider historical context that includes nationally significant coastal defences along the Suffolk coast, dating back to the Napoleonic period contributing to the broader narrative of wartime preparations and the significance of coastal landscapes in Britain's history.
94. Setting contributes to the significance of this asset through:
  - Its strategic position overlooking the sea allowed for effective surveillance and coordination with gun emplacements, providing visual recognition of threats and use of visual rangefinders to coordinate defensive actions against potential naval threats during World War II. Limited modern development in this area means that this can still be readily appreciated.
  - The functional and visual connection to the BOP to gun emplacements on the upper shoreline and mobile guns in the marshes can still be

understood and allow the viewer to appreciate the asset's role in a carefully planned and strategically coordinated defensive network.

### 6.3.2 Predicted change to setting and heritage significance

95. While the proposed turbines will be visible from the BOP it is located c. 40km to the southeast and as such will be a distant background feature of a view in which existing offshore wind turbines are already visible and would be only visible on a day with excellent visibility (Figure 1b, Annex 25.4.1).
96. The visibility of the proposed turbines in this view would not impact on the functional and visual relationship between the BOP and gun emplacements. The Project's location would have been far outside the effective range of the gun emplacement and as such outside its key area of control and as such there would be change to this element of the setting.
97. While the proposed turbines will be visible from the BOP, it will not interact with the views that contribute to its setting. As such, there will be no change to the to the contributing elements of the setting of the BOP due to the presence of the Project.
98. No direct physical changes will occur to these elements of the BOPs heritage significance, and as discussed above, changes to its setting will be nil. As such, there would be no change to the heritage significance of the BOP as a result of the visibility of the Project in the setting of this asset.

## 6.4 Bawdsey Manor Registered Park and Gardens (Grade II NHLE 1001465) and Bawdsey Manor Pulhamite Cliffs (Grade II Listed Building NHLE 1406805)

### 6.4.1 Heritage significance and contribution of setting

99. Bawdsey Manor Park and Gardens occupies an area of approximately 57ha on an exposed coastal location 3km south-west of the village of Bawdsey, close to the mouth of the River Deben. The northern and western boundaries of the park are bounded by Ferry Road, the north-east boundary backs onto farmland and the south-east boundary is formed by the beach and the sea. The Manor stands on a slight prominence above the cliff, with the land falling gently away to the west and north, and steeply to the beach.
100. The gardens were laid out between 1885 and 1909 for Sir Cuthbert and Lady Quilter on advice from Alfred Parsons. The site contains numerous garden features built by James Pulham and Son in the 1890s, including an extensive artificial cliff garden complete with seats and alcoves as well as nine Listed Buildings.
101. Initially a medieval manor likely stood closer to the village, north of the current Manor. In 1840, the site featured a Martello tower from the early 19<sup>th</sup> century and a small farmhouse. The current Manor, built in the 1880s as a holiday residence by Sir Cuthbert Quilter, became the primary family home in the 1890s and underwent gradual expansions.
102. Sir Cuthbert and Lady Quilter transformed the surrounding landscape, incorporating diverse garden styles. The gardens at Bawdsey cover c. 3.5ha

and lie to the south-west and north-east of the Manor, with the artificial cliff walk running to the south-east. From the south-west front a series of terraces, now laid to grass, drop in four stages to a level grassed area, originally a cricket pitch. The red-brick retaining walls of the terraces are cut through by an elaborate staircase which divides into two on the second level. Below the platform is a substantial boathouse which opens onto the third level, originally an extension of the Long Pond which led past the chapel in the grounds (c. 400m to the north-north-west of the Manor and now a ruin) and allowed the Quilters to attend chapel by boat each Sunday. This section of the pond was filled in by the Royal Air Force (RAF) in the mid-20<sup>th</sup> century. At the north end of the top terrace is a single-storey octagonal Tea House, with copper domed roof, Italian tiled interior, and three open arches leading onto the terrace. At the south-west corner of the Manor the terrace rises again, up to a further enclosed lawn on the south-east front.

103. Italianate terraces and lawns can also be seen to the south and more secluded gardens to the north, centred around the circular sunken garden on the Martello tower's site. In 1903, Sir Cuthbert used explosives to demolish the tower, creating the sunken garden connected by underground Pulhamite-covered tunnels to other gardens.
104. The Pulhamite rock, a creation of James Pulham, was used extensively in the landscaping. Bawdsey's Pulhamite incorporated local materials like shingle and shells to mimic natural rock textures. James Pulham and Sons, known for their landscape structures, went out of business in 1939.
105. During World War II, Bawdsey Manor became a RAF radar station, leading to alterations such as gun emplacements in the cliff structure. It became known as RAF Bawdsey. Stables and outbuildings were converted into workshops and 73m wooden receiver towers and 110m steel transmitter towers were built. Bawdsey was the Air Ministry's secret radar research establishment until this moved away on the outbreak of war in 1939. Most of the key radar scientists of the day, and the first generation of RAF and Women's Auxiliary Air Force radar personnel, were trained there. The research station play a key role in developing the Chain Home RDF (radar) system of early warning radar stations. The military vacated in the 1980s, and in 1995, the Manor reopened as a language school. Despite some collapse in the northern section of the cliff, the remainder, along with the grotto, tunnels to the sunken garden, and the Pulhamite bank, are well-preserved in the maintained grounds.
106. The significance of the Bawdsey Manor Park and Garden is recognised by its designation at Grade II and the fact a large number of features within the gardens are designated themselves. They predominantly draw their significance from a mixture of historical and architectural interest and general character. The gardens hold architectural value through the visual appeal of designed compositions and individual elements including the Pulhamite cliff structures. The cliffs are representative of Pulhams' innovative design and construction and are a rare example of such extensive Pulhamite structures in a private garden. Historically Bawdsey Manor was home to the notable Quilter family and later holds significance as a key RAF base. The cliffs benefit from group value with Bawdsey Manor and the registered garden there.
107. Setting contributes to the significance of this asset through:

- The relationship between the Listed Buildings within the park add to the appreciation of the Park and Garden both individually and as a collective group.
- Bawdsey Manor Park and Garden is approached from the east and the west with both lodged entrances being off Ferry Road with the designed frontage and views looking east across the gardens and the Riven Deben as well as to the north from arrival on foot/car.
- The Gardens functional association with Bawdsey Landing to the south can still be appreciated.
- There is a relative lack of modern development around the Park and Garden and Pulhamite Cliffs which adds to the sense of grandeur and isolation.
- The coastal location of the Pulhamite cliffs hold designed picturesque viewpoints out to sea which add to the viewers experience and appreciation of the asset.

#### 6.4.2 Predicted change to setting and heritage significance

108. As outlined above the Bawdsey Manor Registered Park and Pulhamite Cliffs derive their significance from a mixture of historical and architectural interest and general character. Whilst the majority of the designed views within the Park and Garden itself are focused across the River Deben to the east there are purposeful views from the west of the park and in particular the Pulhamite cliffs out to sea.
109. The Project is located c. 40km to the southeast of the Bawdsey Manor Registered Park and Pulhamite Cliffs. The proposed turbines would appear in views across out to sea on days with excellent visibility (Figure 1b, Annex 25.4.1). It is considered that the visibility of the proposed turbines to the southeast of Pulhamite Cliffs and Bawdsey Manor Park will detract from the viewers' ability to appreciate the designated view from the asset to a limited degree. This would cause negligible adverse magnitude of impact on the Pulhamite Cliffs and Bawdsey Manor Park significance. It is therefore judged that there will be a minor adverse effect which would not be significant in EIA terms, but which would give rise to a limited magnitude of less than substantial harm.

## 6.5 Landguard Fort and associated field works (Scheduled Monument/Grade I Listed Building NHLE 1018969/1030415)

### 6.5.1 Heritage significance and contribution of setting

110. Landguard Fort is located on a shingle spit to the south of Felixstowe at the mouth of the River Orwell. The fort in conjunction with other fortifications such as Beacon Hill Battery on the opposite side of the Stour and Orwell estuary, was designed to protect the harbour and dockyard. The spit has grown in length over the centuries, and the main fortress, which when first built was at the southern end, is now some 740m from the point. The associated visible features extend to the northeast and south of the fort over an area approximately 1.4km in length.
111. The fortress, at the core of the complex, is believed to include remnants of the original 18th-century battery and retains much of the external form and structure from the 1740s. The design of the bastioned fort in the 18th century, influenced by French design, reflects the military architecture of its time.
112. Significant alterations in the 1870s incorporated design principles from the Royal Commission forts, featuring distinctive elements such as a casemate battery with granite facing, iron shields protecting gun embrasures, and unique design elements in the caponier. Its designer is not known, but it has similarities to the first Fort Cumberland at Portsmouth designed by John Peter Desmaretz, who is known to have surveyed the Haven in the 1740s. The extensive alterations carried out in the 1870s incorporate some of the distinctive principles of design adopted in the construction of the Royal Commission forts. These were constructed along the south and southeast coast following the recommendations of the 1860 Royal Commission on the Defences of the UK. Despite becoming obsolete soon after remodelling, the fort stands as an impressive example of military engineering from the third quarter of the 19<sup>th</sup> century.
113. The ravelin block is considered the sole surviving complete example of a submarine mining depot from this period. Notably, the subsequent four decades witnessed rapid developments in armaments, and additions during this time, including batteries and fire control systems, are of particular historical interest. Further modifications and additions during World War II contribute to the site's significance, representing a substantial and well-preserved part of the coastal defence system erected in response to the national crisis following the fall of France in May 1940.
114. The significance of this monument is largely derived from the architectural and historic remains and the information these hold about the military organisation of the area in the early 18<sup>th</sup> century. Since its creation the monument has served in the defence and maritime trade of the River Orwell and stand a significance monument that serve as a reminder.
115. Setting contributes to the significance of this asset through:
  - The fort was constructed at location where it could best serve its purpose as such, the coastal setting and particularly its visual relationship with Felixstowe docks and the river mouth is key to its understanding.



- Relationship between Languard Fort and others in the area can still be appreciated. Key views include those from fort and Beacon Hill Battery, between the Beacon Hill Battery and the fort and from the fort out over the harbour and dockyard.

### 6.5.2 Predicted change to setting and heritage significance

116. As outlined above, the has key views over the Orwell and Stour estuary and further afield towards the sea to the east. While the proposed turbines will be visible from the fort, it is located c. 41km to the southeast and as such will be difficult to discern on the horizon and only visible on a day with excellent visibility (Figure 1b, Annex 25.4.1). The key views from the fort over the Stour and Orwell estuary, notably, and most importantly, towards Beacon Hill Battery will remain unaffected by the Project.
117. No direct physical changes will occur to the heritage significance of the monument, and as discussed above, changes to its setting which contribute to its value would be nil. As such, there would be no change to the heritage significance of the monument.

## 6.6 Naze Tower (Grade II\* Listed Building, NHLE 1165846)

### 6.6.1 Heritage significance and contribution of setting

118. The Naze Tower is a navigation tower located in an open area of the Naze near Walton-on-the-Naze.
119. Constructed in 1720 for Trinity House, the Navigation Tower is made of plum-coloured brick and features an octagonal structure with three reducing stages and clasping buttresses at the angles. The upper stage from the 19<sup>th</sup> to 20<sup>th</sup> century has been added. A moulded brick plinth with a 1979 concrete plinth below supports the tower. The third stage has two upper round-headed window openings, one of which is now blocked, and three windows above the second stage, two of which are blocked. The second stage includes two round-headed windows and a single window in the first stage. The entrance is equipped with 20<sup>th</sup> century double vertically boarded doors and a concrete lintel. Above the doorway, a lead plaque indicates "Trinity House 1720."
120. Internally, the tower consists of several storeys accessible via an iron spiral staircase. The top section features an iron framework. The tower was designed to work in conjunction with Walton Hall Tower to the south as a guide for vessels navigating through the Goldmer Gap. Additionally, it served as a beacon, along with a light in Suffolk, to guide ships into the rivers marking the border between Suffolk and Essex.
121. Throughout its history, the tower has served diverse purposes. In the eighteenth century, it functioned as a tea house under the management of the actress Martha Reay. During the Napoleonic Wars and the Great War of 1914–18, it operated as a lookout. In the Second World War, the tower transitioned into a radar station, necessitating the removal of its crenelations to make room for a radar dish. It is currently in use as an art gallery with a tearoom and roof viewing platform.

122. The tower has also appeared in paintings in 1800 by John Thomas Smith and 1837 by John Constable. The significance of this monument is largely derived from its architectural, artistic and historical values.
123. Setting contributes to the significance of this asset through:
- The tower retains its original prominent position on a largely featureless section of the Naze, where any modern development is mainly limited to single story dwellings allowing the dominance of the tower to still be appreciated.
  - The functional connection and uninterrupted visibility out to sea can still be appreciated and, significantly, the absence of taller development around it means it can still operate in its designed function as a sea mark.
  - The historical connection with Walton Hall Tower to the south can still be understood, to guide vessels through the gap in the offshore shoals known as Goldmer Gap.

#### 6.6.2 Predicted change to setting and heritage significance

124. As outlined above, the significance of the towers is largely derived from its architectural, artistic and historical values. It is likely the proposed turbines will be visible from the tower, however they are located c. 40km to the southeast and only visible on a day with excellent visibility (Figure 1b, Annex 25.4.1). As the towers primary purposes was a landmark navigation beacon when looking from the sea (in conjunction with Walton Hall Tower) rather than outward looking, a role in which much closer visibility looking to the landward from the sea, the presence of the Project in these long range views would not impact on this central contribution of the tower's setting.
125. No direct physical changes will occur to the heritage significance of the monument, and as discussed above, changes to its setting which contribute to its value would be nil. As such, there would be no change to the heritage significance of the asset.

### 6.7 Clacton Seafront Conservation Area

#### 6.7.1 Heritage significance and contribution of setting

126. Situated in the Tendring District, Clacton-on-Sea is located to the south of Great Clacton along the coastline, spanning about 4 miles from Jaywick in the west to Holland-on-Sea in the east. It stands as the most extensively developed area within the Tendring peninsula, having historically grown into a prominent seaside resort that continues to draw significant tourism, particularly during the summer months.
127. The Conservation Area spans from Martello Tower F to the historic hotel known as 'The Towers' along the seafront. At its heart lies Clacton Pier, along with its adjoining beach area. The designation also encompasses portions of the planned resort located between Marine Parade, Church Road, and High Street, as well as the roads directly north of Marine Parade West.
128. The area of Clacton-on-Sea was largely undeveloped until the eighteenth century, and the agricultural landscape of scattered farmsteads and manors



were replaced by Peter Bruff's designed seaside town from the mid-nineteenth century.

129. The special character of Clacton Seafront Conservation Area is derived from its seaside architecture and formal planned street pattern (Tendring District Council, 2006). The Conservation Area is the heart of the coastal resort and includes Victorian and Edwardian seaside buildings that were part of the early planned development of the resort, as well as formal gardens and pavilions, and important landmarks like the Martello Tower F and the Pier.
130. The significance of the Conservation Area is largely derived from its historical development and architectural interest. The Conservation Area is noted as comprising three sub-areas (Tendring District Council, 2006) which are summarised below. These are:
  - The Commercial Centre
  - Residential Areas
  - The Seafront
131. The Commercial centre is defined by its densely populated urban landscape featuring prominent storefronts. Several streets have undergone pedestrianisation, incorporating greenery and street furnishings. The architectural landscape predominantly consists of nineteenth and twentieth-century structures, primarily two to three-story brick terraces. Many buildings are unpainted, revealing distinctive brick banding on upper floors. Some structures are painted in light pastel hues, reflecting a coastal ambiance, while a few deviate with darker colours. Modern shop fronts and signage dominate street levels, but historical architectural elements, notably pilasters and decorative capitals, persist along the High Street, contributing character to storefronts.
132. The overall character of the residential area is defined by modest-sized developments, showcasing terraced housing predominantly to the west and more spacious semi-detached properties to the east. Detached dwellings are situated on corner plots. The streets, especially those aligned with Bruff's initial designs, are intentionally oriented to offer scenic vistas of the sea and open areas, often featuring pavilions within view. These streets maintain their original layout from the master plan, preserving historical, visual, and functional connections to the seafront.
133. The Seafront serves as the central feature of the coastal resort, distinguished by iconic seaside architecture and landscape components. Notable elements include the Pier, Martello Tower, the beach, cliffs, open spaces along the cliff ridge, and the historically significant hotel streetscape along Marine Parade. The character area concludes at Martello Tower F, a scheduled monument and listed building situated on elevated terrain to the west, acting as a boundary between the Conservation Area and modern development along the coast. To the east, the termination point is marked by The Towers, a substantial corner plot guesthouse with prominent turrets. The area encompasses structures north of Marine Parade, mainly comprising guesthouses and hotels, and extends southward to encompass cliffs, beaches, and the Pier. The varied topography features steep slopes descending to the sea, offering buildings on Marine

Parade panoramic views of the sea, while open spaces and the Registered Park and Garden on the cliff top provide additional vantage points towards the sea and Pier below.

134. The seafront area is included in the Conservation Area for its relevance to the original pattern of development, to the subsequent aspirations of the town, and to the relative strength of seaside “character”.
135. Key views detailed in the Conservation Area Appraisal (Tendring District Council, 2006) relevant to this assessment as outward looking towards the sea are noted as:
  - View 2, from the square on Pier Avenue towards the sea;
  - View 6, from the Martello tower towards sea; and
  - View 67 from the Martello tower towards the historic hotel streetscape along marine parade.
136. The significance of the Conservation Area is partly derived from its setting. The sea and views of the sea add to the character and appreciation of the seaside resort with the mixture of architecture providing a sense of history to its development. Open views of the sea undoubtedly enhance the special character of the Conservation Area.

#### 6.7.2 Predicted change to setting and heritage significance

137. Key features and views that contribute to the setting of the Conservation Area are discussed in Section 6.7.1 above. The significance of the Conservation Area is largely derived from its historical development and architectural interest. The architectural values of the conservation area largely reside in views of the seafront buildings appreciated as the viewer moves along the seafront and experiences series of fortuitous compositions of key buildings. The character of the Conservation Area also contributes to its significance.
138. Views that may be affected by the Project are those from the Martello tower and from the square on Pier Avenue out to the sea as the Project will be visible (Figure 1d, Annex 25.4.1). Uninterrupted views of the sea are achievable along Marine Parade and the Pier.
139. The proposed turbines will be located c. 49km to the east of the Conservation Area. Long-distance views of the proposed turbines on the horizon may be achievable on clear days (as assessed in Chapter 29 Seascape, Landscape and Visual Impact Assessment (Document Reference: 3.2.25)).
140. The visibility of the proposed turbines on the horizon will not detract from the viewers ability to view and appreciate the historic and architectural interest of the Conservation Area. As such, no change to the setting of the Conservation Area is predicted as a result of the Project.

#### 6.8 Summary

141. A summary of the predicted change to the heritage significance of the identified heritage assets provided in Table 1.

**Table 1 Summary of predicted change to heritage significance**

Name	List Entry	Distance and direction to the wind farm array area	Predicted change to heritage significance
The chain of Martello Towers between Slaughden (Aldeburgh) and Jaywick	See Section 6.1	c. 40 – 45km east and southeast	No Change
Orford Castle with adjoining quarry and remains of 20th century look-out post (Scheduled Monument and Grade I Listed Building NHLE 1014860/1030873)	1014860/1030873	c. 42km southeast	No Change
Battery Observation Post, Bawdsey (Grade II Listed Building, NHLE 1389463)	1389463	c. 40km southeast	No Change
Bawdsey Manor Registered Park and Gardens (Grade II NHLE 1001465) and Bawdsey Manor Pulhamite Cliffs (Grade II Listed Building NHLE 1406805)	1001465/1406805	c. 40km southeast	Minor Adverse
Landguard Fort and associated field works (Scheduled Monument/Grade I Listed Building NHLE 1018969/1030415)	1018969/1030415	c. 41km southeast	No Change
Naze Tower (NHLE 1165846)	1165846	c. 40km southeast	No Change
Clacton Seafront Conservation Area.	N/A	c. 49km east	No Change

## 7 Explore ways to maximise enhancement and avoid or minimise harm (Step 4)

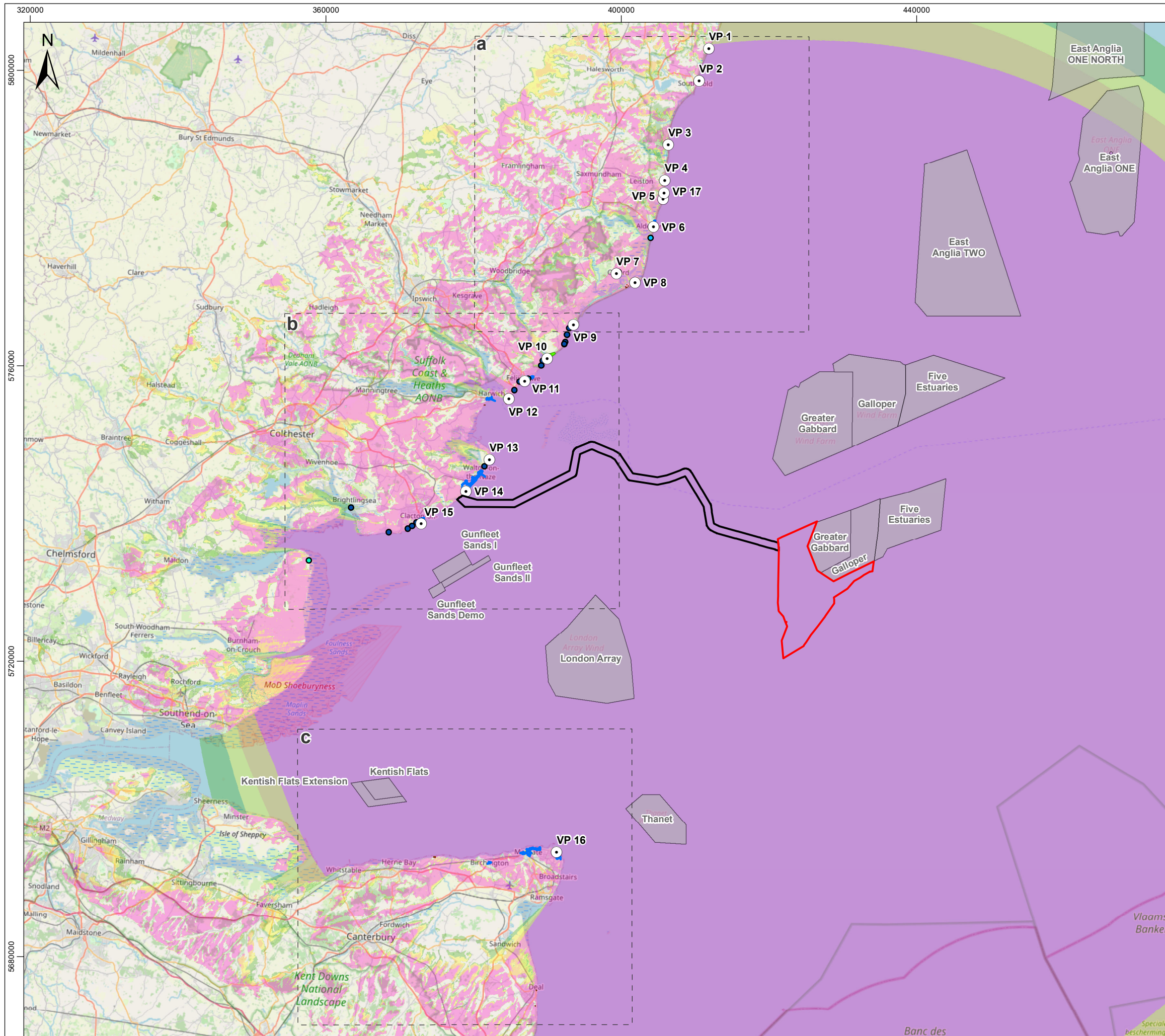
143. It is concluded that there will be a minor adverse effect which would not be significant in EIA terms to Pulhamite Cliffs (Grade II Listed Building NHLE 1406805) and Bawdsey Manor Park (Grade II NHLE 1001465). It is noted that the layout of the offshore array will be designed appropriately to minimise visual effects, taking into account other constraints such as ecological effects, safety reasons or engineering and design parameters.
144. There would be no impact to the heritage significance of any of the other heritage asset assessed, due to either there being no change to setting, or the change being negligible. As such no mitigation measures are required.

## 8 References

Clements, W. H. (1998) <i>Towers of Strength: Martello Towers Worldwide</i>
Department for Energy Security and Net Zero (DESNZ) (2023) <i>Overarching NPS for Energy</i> (EN-1)
Historic England (2007) <i>An Assessment of the East Coast Martello Towers: Desk Top Assessment</i> . Historic England. Available at: <a href="https://historicengland.org.uk/research/results/reports/6354/AnAssessmentoftheEastCoastMartelloTowers">https://historicengland.org.uk/research/results/reports/6354/AnAssessmentoftheEastCoastMartelloTowers</a>
Historic England (2017). <i>The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)</i> . Historic England. Available at: <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/</a> . [Accessed 09/11/22].
Ministry of Housing Communities and Local Government (2021). <i>National Planning Policy Framework</i> . Available at: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</a> . [Accessed: 09/11/2022].
Ministry of Housing Communities and Local Government (2019). <i>Planning Practice Guidance (PPG): Historic Environment (July 2019)</i> . Available at: <a href="https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment">https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment</a> [Accessed: 09/11/2022].
Tendring District Council (2006). <i>Clacton Seafront Conservation Area Appraisal</i> .

# Annex 25.4.1 Figures





**Legend**

- North Falls Array Area
- North Falls Offshore Cable Corridor
- Offshore Wind Farm Site
- Viewpoint
- Scheduled Monument
- Parks and Garden
- Conservation Area

**Listed Building Grade**

- I
- II\*
- II

**Bareground ZTV to Tip (381.39m)**

- 1 - 10 Turbines Visible
- 11 - 20 Turbines Visible
- 21 - 30 Turbines Visible
- 31 - 34 Turbines Visible

0 2.5 5 10 nm

0 5 10 20 km

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**Coastline Designated Heritage Assets Selected for Further Assessment**

Rev	Date	Remarks	Drwn	Chkd
01	30/11/2023	First issue	FC	JM

Drawing Number <b>PB9244-RHD-ZZ-OF-DR-GS-0396</b>		Figure Number <b>1a</b>	
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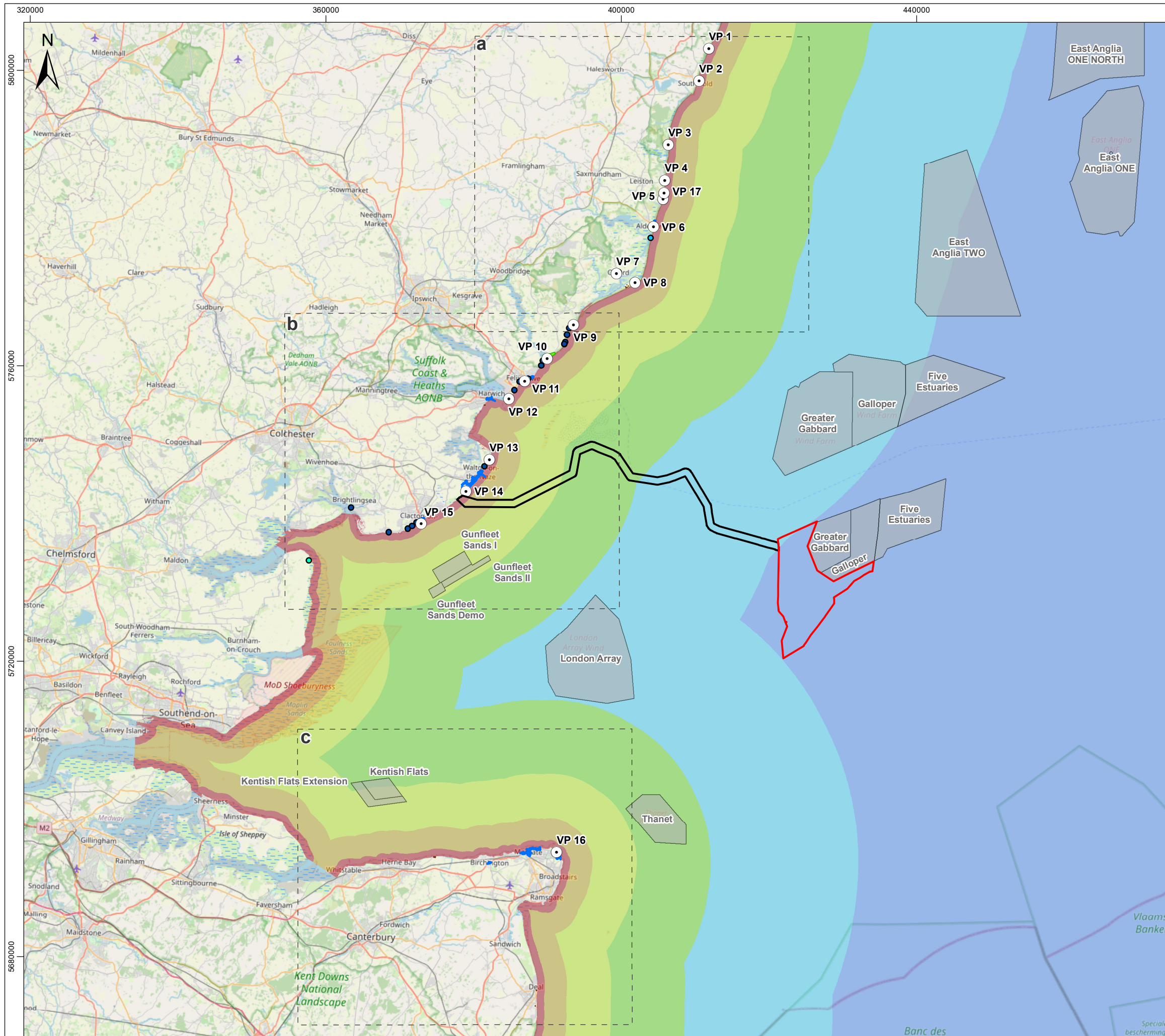


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NORTH FALLS  
Offshore Wind Farm





**Legend**

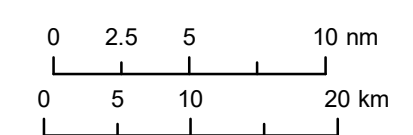
- North Falls Array Area
- North Falls Offshore Cable Corridor
- Offshore Wind Farm Site
- Viewpoint
- Scheduled Monument
- Parks and Garden
- Conservation Area

**Met Office Visibility Range**

- < 1km Very Poor Visibility
- 1 - 4km Poor Visibility
- 4 - 10km Moderate Visibility
- 10 - 20km Good Visibility
- 20 - 40km Very Good Visibility
- > 40km Excellent Visibility

**Listed Building Grade**

- I
- II\*
- II



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**Coastline Designated Heritage Assets Selected for Further Assessment**

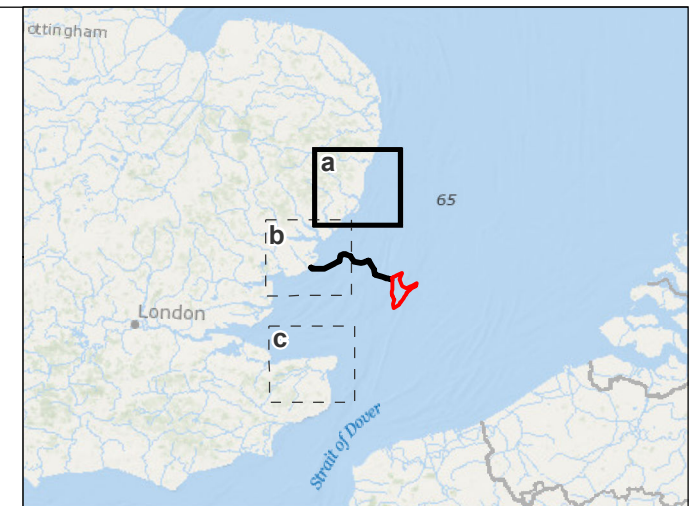
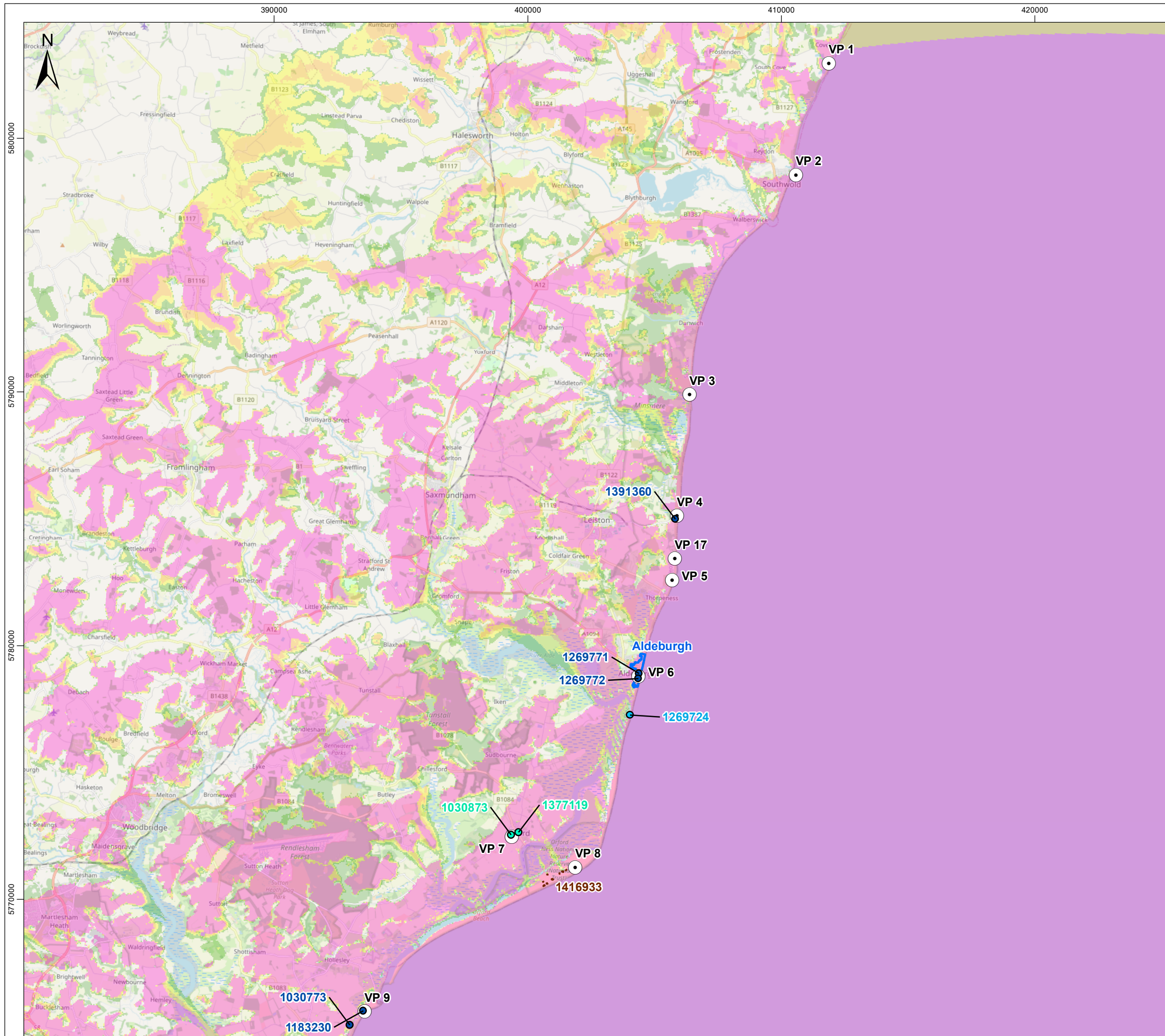
Rev	Date	Remarks	Drwn	Chkd
01	30/11/2023	First issue	FC	JM

Drawing Number: **PB9244-RHD-ZZ-OF-DR-GS-0396** Figure Number: **1b**

Scale: 1:515,000 Plot Size: A3 Datum: WGS84 Projection: UTM31N





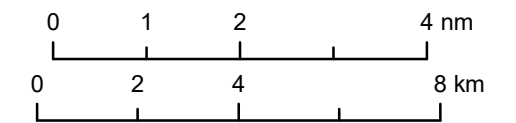


**Legend**

- North Falls Array Area
- North Falls Offshore Cable Corridor
- Viewpoint
- Scheduled Monument
- Conservation Area
- Listed Building Grade**
- I
- II\*
- II

**Bareground ZTV to Tip (381.39m)**

- 1 - 10 Turbines Visible
- 11 - 20 Turbines Visible
- 21 - 30 Turbines Visible
- 31 - 34 Turbines Visible



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**Coastline Designated Heritage Assets Selected for Further Assessment**

Rev	Date	Remarks	Drwn	Chkd
01	30/11/2023	First issue	FC	JM

Drawing Number	Figure Number
<b>PB9244-RHD-ZZ-OF-DR-GS-0396</b>	<b>1c</b>

Scale	Plot Size	Datum	Projection
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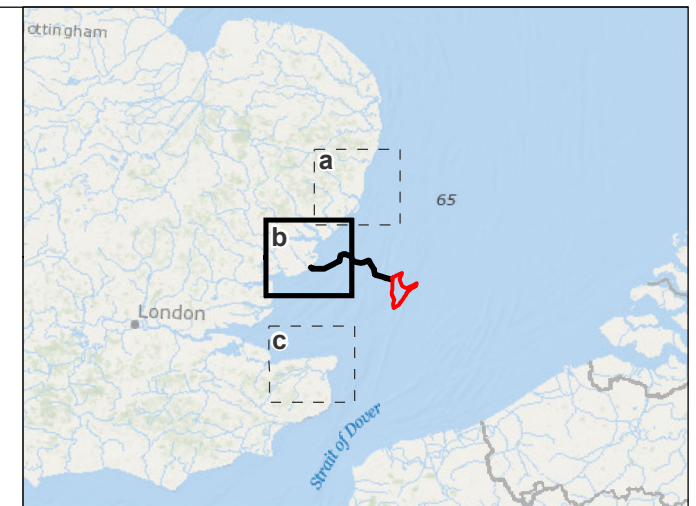
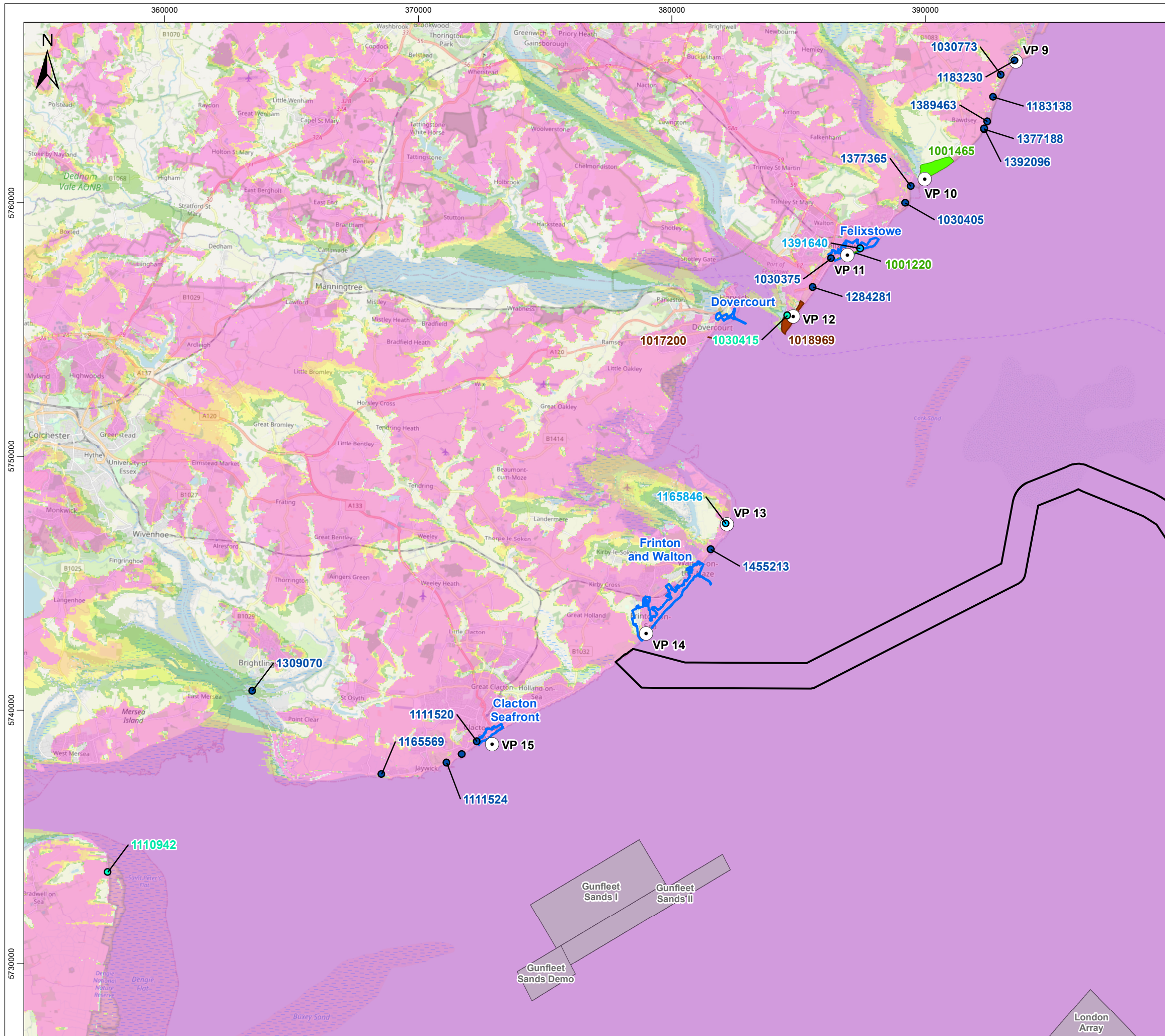


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**NORTH FALLS**  
Offshore Wind Farm





**Legend**

- North Falls Array Area
- North Falls Offshore Cable Corridor
- Viewpoint
- Offshore Wind Farm Site
- Scheduled Monument
- Parks and Garden
- Conservation Area

**Listed Building Grade**

- I
- II\*
- II

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- 1 - 10 Turbines Visible
- 11 - 20 Turbines Visible
- 21 - 30 Turbines Visible
- 31 - 34 Turbines Visible

0 1 2 4 nm  
0 2 4 8 km

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**Coastline Designated Heritage Assets Selected for Further Assessment**

Rev	Date	Remarks	Drwn	Chkd
01	30/11/2023	First issue	FC	JM

Drawing Number <b>PB9244-RHD-ZZ-OF-DR-GS-0396</b>		Figure Number <b>1d</b>	
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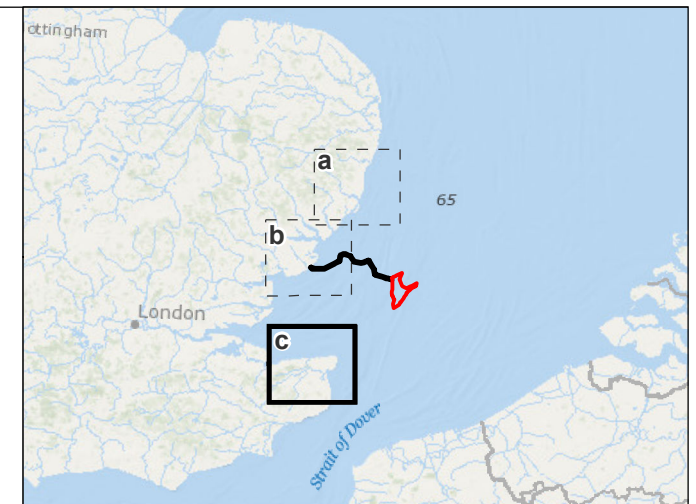
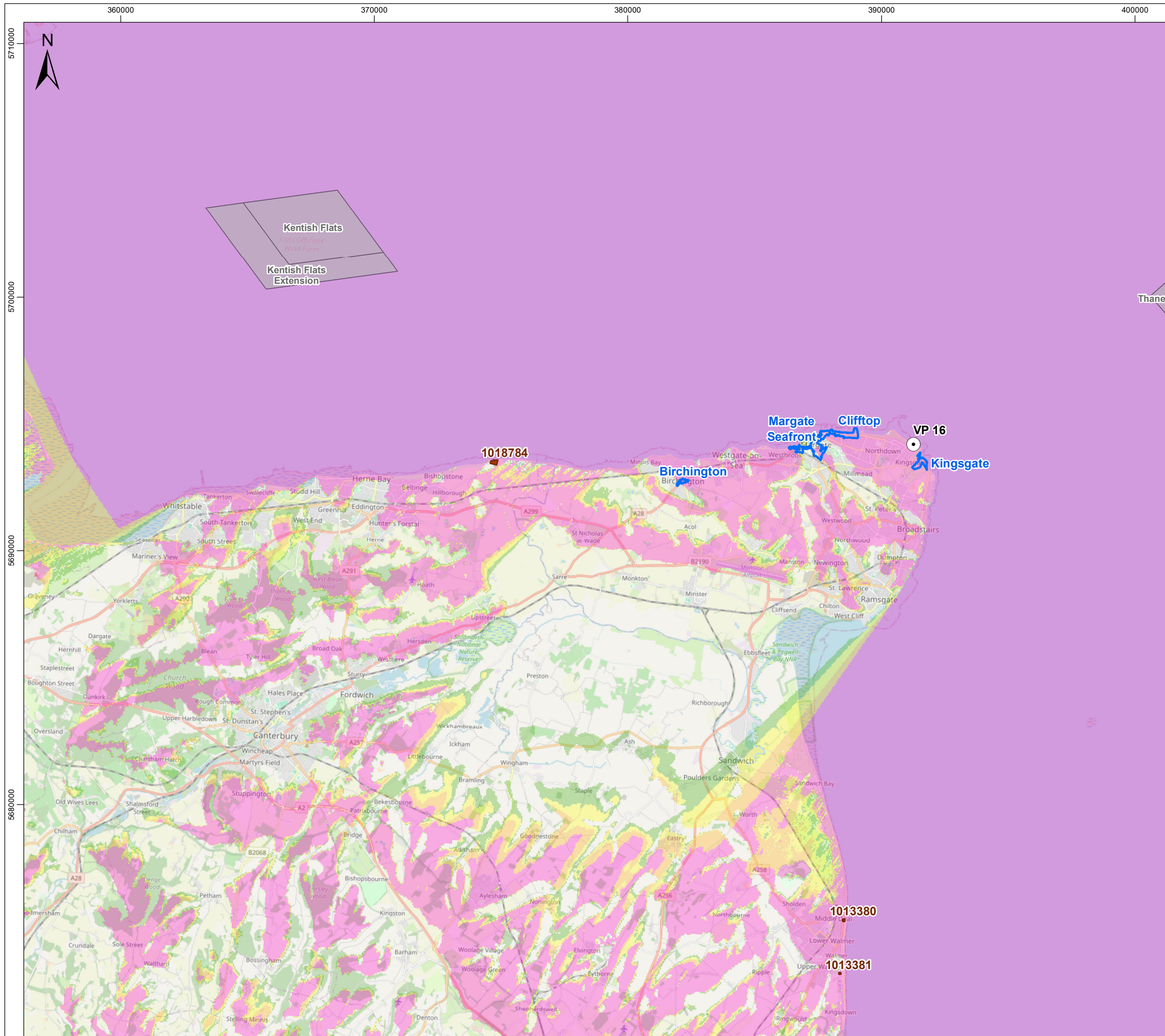


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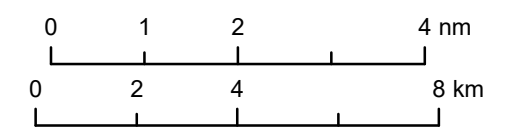


**NORTH FALLS**  
Offshore Wind Farm





- Legend**
- North Falls Array Area
  - North Falls Offshore Cable Corridor
  - Viewpoint
  - Offshore Wind Farm Site
  - Scheduled Monument
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Drawing Title  
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Rev	Date	Remarks	Drwn	Chkd
01	30/11/2023	First issue	FC	JM

Drawing Number <b>PB9244-RHD-ZZ-OF-DR-GS-0396</b>	Figure Number <b>1e</b>
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Scale 1:150,000	Plot Size A3	Datum WGS84	Projection UTM31N
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# Annex 25.4.2 Offshore Infrastructure Settings Scoping Appraisal



**NORTH FALLS**

*Offshore Wind Farm*

# **ENVIRONMENTAL STATEMENT**

## **Offshore Infrastructure Settings Scoping Appraisal**

*Document Reference No: 005039002-01*

*Date: July 2024*

*Revision: 01*



**NORTH FALLS**

*Offshore Wind Farm*

# ENVIRONMENTAL STATEMENT

*July 2024*

<b>Project</b>	North Falls Offshore Wind Farm
<b>Sub-Project or Package</b>	Environmental Impact Assessment
<b>Document Title</b>	Environmental Statement Annex 25.4.1 Offshore Infrastructure Settings Scoping Appraisal
<b>Document Reference</b>	005039002-02
<b>Revision</b>	02 (Draft B)
<b>Supplier Reference No</b>	PB9244-RHD-ZZ-ON-SP-HC-0167

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<b>Revision</b>	<b>Date</b>	<b>Status/Reason for Issue</b>	<b>Originator</b>	<b>Checked</b>	<b>Approved</b>
01 (Draft B)	30/11/2023	For issue to Cultural Heritage ETG	HM	JM/GC	-
02 (Draft B)	21/01/2024	For DCO submission	HM	JM/GC	NFOW

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2 Methodology ..... 7

3 Summary of baseline environment..... 8

4 Conclusions ..... 9

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5 References..... 24



## Glossary of Acronyms

EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
GPA3	Good Practice Advice in Planning Note 3
HE	Historic England
HER	Historic Environment Record
NFOW	North Falls Offshore Wind Limited
PEIR	Preliminary Environmental Information Report
RNLI	Royal National Lifeboat Institution
SLVIA	Seascape, Landscape and Visual Impact Assessment

## Glossary of Terminology

The Project or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.
The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
Array cables	Cables which link the wind turbine generators with each other, the offshore substation platform(s) and/or the offshore converter platform.
Landfall	The location where the offshore export cables come ashore at Kirby Brook
Offshore cable corridor	The corridor of seabed from array areas to the landfall within which the offshore export cables will be located.
Offshore export cables	The cables which bring electricity from the offshore substation platform(s) to the landfall, as well as auxiliary cables.
Offshore project area	The overall area of the array areas and the offshore cable corridor.
Offshore substation platform(s)	Fixed structure(s) located within the array area, containing HVAC electrical equipment to aggregate the power from the wind turbine generators and increase the voltage to a more suitable level for export to shore via offshore export cables.
Wind turbine generator	Power generating device that is driven by the kinetic energy of the wind.

## 1 Introduction

1. In August 2023, North Falls Offshore Wind Limited (NFOW) received Section 42 consultation comments from Historic England (HE) on the proposed North Falls Offshore Wind Farm (herein 'North Falls' or 'the Project') Preliminary Environmental Information Report (PEIR) in relation to the assessment of setting of onshore heritage assets arising from visibility of the North Falls array area (herein the 'offshore settings assessment'). The HE comments requested that NFOW consider a wider spatial scope for the offshore settings assessment.
2. The HE PEIR response stated:

*'We note the coastal heritage assets considered... are limited to the Tendring coastline... We would strongly recommend a larger study area is included in the assessment, to ensure all the highly-graded heritage assets potentially impacted by the offshore infrastructure are adequately assessed... viewpoints and visualisations must be heritage-specific to enable the visual impact of the scheme on the setting of key highly-graded designated heritage assets to be adequately assessed.... the setting assessment should be carried out in accordance with the approach set out in Historic Environment Good Practice Advice in Planning Note 3, The Setting of Heritage Assets (GPA3).'*
3. These comments were subsequently discussed during an Expert Technical Group (ETG) meeting held between NFOW and HE on 8 November 2023, where it was agreed that the scope of the onshore settings assessment would be defined and subsequently consulted on with HE.
4. This appraisal has been carried out by Royal HaskoningDHV to respond to the HE request to consider a larger study area, and also has regard to the amendments made to the North Falls array area since the completion of the Project's Section 42 consultation. The purpose of the appraisal is to identify the scope of the North Falls offshore settings assessment.
5. This appraisal also fulfils the requirements of Step 1 of the methodology set out in GPA3 (Historic England, 2017). This step is defined as:
  - Step 1: Identify which heritage assets and their settings are affected
    - This appraisal therefore identifies those heritage assets which have the potential to be affected by construction, operation and decommissioning of the offshore infrastructure of the Project. These heritage assets will be taken forwards for detailed assessment within the Environmental Impact Assessment (EIA) process.
    - The assessment in the Environmental Statement (ES) will address the requirements of Steps 2, 3, 4 of the GPA3 process, while Step 5 relates to decision-making and post-consent monitoring.
6. This appraisal also sets out proposed viewpoint locations.

## 2 Methodology

7. GPA3 sets out that it is appropriate to agree an 'area of search' around the project array areas within which it is reasonable to consider setting effects, and that this area of search should be defined with regard to the calculated Zone of Theoretical Visibility (ZTV) of the project array areas.
8. This scoping appraisal has therefore drawn on the draft ZTV prepared for the Project to help define the area of search and assist the identification of potentially affected heritage assets within the identified areas of search.
9. As setting relates to the perceptual environment in which a heritage asset is experienced, this assessment takes account of all and any perceptual change within that environment.
10. In this context, however, change would exclusively be experienced as visual change resulting from visibility of elements of the proposed offshore development within the setting of the asset; this visibility may be in views of or from the heritage asset, or from other parts of the setting where visibility would cause the viewer to experience the asset differently as a consequence of that view.
11. Clearly, different heritage assets and classes of heritage assets will have different characteristics of setting and will be sensitive to different types of change, and it is important to note that visibility would not necessarily give rise to an effect, even where the form or movement of turbines was felt to be in some way incongruous with the existing scene. For an effect on the significance of a heritage asset to arise, there must be a discernible change in the contribution of setting to the significance of an asset as defined by NPS EN-1 and Good Practice Advice in Planning: 2 Managing Significance in Decision-Taking in the Historic Environment Historic Environment (Historic England, 2015). In this case, it is considered that designated heritage assets have the potential to be affected where there is a visual connection to the sea, and where that visual connection provides either a backdrop to a designed or fortuitous architectural composition, or where those views provide a specific connection to the asset that allows historic interest and associations to be understood. Similarly, many of these heritage assets relate to busy shipping lanes and were designed to afford visibility of offshore vessel movements, meaning that visibility of offshore structures is not necessarily discordant with any designed function.
12. In this context, it is important to note that the proposed separation of the proposed turbines from designated heritage assets means that they will always be perceived as distant elements of the background to views and will not become visually dominant features. Therefore, the potential for significant adverse effects to arise would be limited to significant designated heritage assets which have clear and direct visual relationships with the sea which contribute specifically to their significance. Examples of these connections include:
  - Functional relationship; for example where shore-based establishments relate to activities in specific sea areas, although for setting to be affected some form of direct visual connection (for example a line of sight to a

specific hazard such as a sandbank or shoal, or to a harbour mouth) would normally be required.

- Specific areas of control/surveillance/view; for example military sites and coastguard lookouts. In these cases, regard should be had to understanding the likely planned extent of any designed surveillance, fire control and the bearing/subject of views, as many of these sites were designed to control very specific areas of sea, and form mutually supportive networks.
- Scenic Qualities: where the view out to sea forms a part of a designed or fortuitous architectural composition, particularly in views that have been celebrated or depicted in art, or which allow regionally distinctive building forms or asset types to be located within that context).
- Absence of the modern: where the absence or lack of prominence of visibly modern landscape and seascape elements contributes to a viewer's ability to perceptually engage with a heritage asset, 'imagine' it more clearly in past use or contributes to a more romantic, imagined sense of ruin or 'otherness'.

### 3 Summary of baseline environment

13. The terrestrial elements of the study area encompass a wide variety of historic seascapes, comprising the dynamic shingle landscape of the East Suffolk Coast, the ports of the Deben, Stour and Orwell estuaries and the low cliffs and sandy beaches of the shore of the Tendring Peninsula. The study area also includes the Isle of Thanet, with its chalk cliffs, historic ports and resort towns.
14. This historic character means that in most views, designated heritage assets are located in a context that reads to the viewer as containing modern landscape and seascape elements, which are prominently visible. This would not necessarily preclude the potential for an adverse effect, but means that in general, this historic seascape is less sensitive.
15. Heritage assets within the study area considered for inclusion in the scope of assessment comprise:
  - Coastal defences
    - These sites have been considered as they were designed to overlook or control specific areas of the coast and sea, and change to those views has the potential to adversely affect the viewers ability to appreciate that historical function. Some of these features survive as ruins, as at Reculver, or have been built into modern townscapes, as at Clacton, presenting fortuitous and designed architectural compositions.
    - They range in date from the Romano-British period, represented by the Saxon Shore Fort at Reculver, and Medieval Period, most notably Orford Castle. The most prominent features, however, are those of the post-medieval period, with the forts designed to protect the ports of Harwich and Felixstowe, and the network of Martello Towers built along the Essex and Suffolk coasts to protect against invasion by the

French. Modern defences include coastal batteries designed to protect against German raids and invasion.

- Sea Marks and lighthouses
  - These features comprise taller structures that were used for navigation near-shore. While this navigational use primarily related to navigation well inshore of the project array areas, their visual prominence means that they frequently feature as focal points of fortuitous architectural compositions, which may be affected by the visibility of the project array areas.
  - These assets primarily comprise purpose-built features such as lighthouses and the Naze Tower at Walton on the Naze, but also include taller buildings near the coast, most notably Orford Castle or the towers at Reculver.
- Seafront conservation areas
  - These assets draw considerable significance from their connection to the sea, although for most assets within them this connection is generalised and would not normally be sensitive to visibility of the proposed turbines at the distances anticipated.
  - In some cases, there may be specific architectural compositions that may be more sensitive; for example in views towards or along a pier or across a harbour or bay.
- Lookouts and maritime features
  - These features include coastguard or RNLi lookouts, lifeboat stations, rocket rescue houses as well as docks, harbour walls, piers or similar features.
  - In most cases, these would gain most significance from visual connections to specific areas of seas and coast in relative proximity (e.g. where they were built to look out over specific navigational hazards or harbour approaches for vessels in distress), and it is not anticipated that these connections would be affected by distant visibility of the project array areas.
  - Many of these features would also be associated with harbours which remain in use and have been significantly altered, meaning that modern infrastructure is an important element of setting and these features are less sensitive to change arising from distant visibility of turbines.

## 4 Conclusions

### 4.1 Results of the Appraisal

16. The results of the scoping appraisal are set out in Table 4.1 below. This appraisal has identified a 'long list' of individual designated and non-designated heritage assets within the categories noted above that may be affected by development of the project array areas. Heritage assets are referenced by their

National Heritage List for England number or by name of conservation area. Where the asset is represented by a Seascape, Landscape and Visual Impact Assessment (SLVIA) viewpoint, this has been cross-referenced. These assets are shown on Figure 1, Annex 25.4.1.

17. This long list of heritage assets has then been reviewed to identify those assets which have the potential to be impacted by the project array areas, based on the criteria set out in Section 2 above. The heritage assets taken forward for further assessment are highlighted in **bold**. Rationale for these decision for each asset is set in Table 4.1. Only these heritage assets will be taken forward for further assessment.



**Table 4.1 Scoping appraisal**

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
-	Conservation Area	Aldeburgh	As a seaside holiday town, the conservation area focuses on the town's connection to the water. The Slaughden Martello Tower area incorporated into the Conservation Area directly adjoins the coast with the seafront essential to the character of the area. However, at the proposed separation the turbines will not be visible in the setting of the Conservation Area with sufficient prominence to interact with any contribution to significance. Further assessment will not be undertaken (SLVIA VP6).	40 to 50km	No
1391360	Grade II Listed Building	The Watch-House	The turbines would be visible from this asset only in excellent conditions and even in those views would appear as very distant elements of the background to views. Any visual connection to the sea would relate to much closer views of the coast. The project array areas would not be sufficiently perceptible to give rise to any change to setting. Further assessment will not be undertaken.	50 to 60km	No
1269771	Grade II Listed Building	The North Lookout	Though this lookout faces towards the sea, the asset derives its connection to the sea from its role for nearshore observation and visibility of the proposed turbines as background elements of the view will not affect the contribution of the setting to significance. Considering this, the impact to the setting of this asset will not be assessed further.	40 to 50km	No
1269772	Grade II Listed Building	The South Lookout	Though this lookout faces towards the sea, the asset derives its connection to the sea from its role	40 to 50km	No

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
			for nearshore observation. Visibility of the proposed turbines as background elements of the view will not affect the contribution of the setting to significance and will not be assessed further.		
1006041/1269724	Scheduled Monument and Grade II* Listed Building	Slaughden Martello tower / Martello Tower	<b>Given the uninterrupted setting of the Martello Tower with a relative lack of modern development surrounding the site, the distant visibility of the proposed turbines may give rise to an adverse change in setting and further assessment will be undertaken (SLVIA VP6).</b>	40 to 50km	Yes
1416933	Scheduled Monument	Orford Ness: the Atomic Weapons Research Establishment test buildings and associated structures	Though the turbines have potential to be in view of Orford Ness, the scheduled monuments were not designed to look out towards the sea. Though the turbines may affect the background view of the monuments, with the distances involved the turbines will not be visible with sufficient prominence to affect the viewer's perception of the assets as deliberately remote structures or affect the fortuitous architectural composition in views from Orford, and would not impact significance. Further assessment will not be undertaken (SLVIA VP8).	40 to 50km	No
1014860/1030873	Scheduled Monument and Grade I Listed Building	Orford Castle with adjoining quarry and remains of 20th century look-out post	<b>The proposed turbines may be visible in views to sea from the upper storeys and roof of the castle, and while they would appear as distant background elements in these views there is a potential for an adverse effect to arise. Further assessment will therefore be undertaken (SLVIA VP7).</b>	40 to 50km	Yes

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
1377119	Grade I Listed Building	St Bartholomew's Church	The proposed turbines have potential to be visible from the tower of this listed church. However, if there is any significance this will be limited due to the distance of this listed building from the coastline on top of the 40-50km distance of the turbines from the shore of this area. Considering this alongside the building's lack of direct functional relationship with the coastline means that further assessment will not be undertaken.	40 to 50km	No
1006034/1183230	Scheduled Monument/ Grade II Listed Building	Martello tower at Shingle Street/ Martello Tower	<b>The distant visibility of the proposed turbines may give rise to adverse change in setting, particularly given the limited development surrounding this monument which contributes to a sense of time-depth. Further assessment will be undertaken (SLVIA VP9).</b>	40 to 50km	Yes
1006014/1030773	Scheduled Monument and Grade II Listed Building	Martello tower SE of Buckanay Farm/ Martello tower at TM 361 419	<b>The distant visibility of the proposed turbines may give rise to adverse change in setting, particularly given the limited development surrounding this monument which contributes to a sense of time-depth. Further assessment will be undertaken.</b>	40 to 50km	Yes
1006015/1183138	Scheduled Monument /Grade II Listed Building	Martello tower by Bawdsey Beach/ Martello tower at TM 358 410	<b>The distant visibility of the proposed turbines may give rise to adverse change in setting, particularly given the limited development surrounding this monument which contributes to a sense of time-depth. Further assessment will be undertaken.</b>	40 to 50km	Yes

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
1389463	Grade II Listed Building	Battery Observation Post	The distant visibility of turbines may give rise to adverse change in setting, by appearing in views in the angle of view that was intended to be visually controlled by this post, albeit well beyond the range of any designed fire control. Further assessment will be undertaken.	40 to 50km	Yes
1002969/1377188	Scheduled Monument /Grade II Listed Building	Martello tower at Rose Cottage/ Martello tower adjacent to Rose Cottage	The distant visibility of the proposed turbines may give rise to adverse change in setting, particularly given the limited development surrounding this monument which contributes to a sense of time-depth. Further assessment will be undertaken.	40 to 50km	Yes
1392096	Grade II Listed Building	Tower House	Positioned next to a Martello tower, this listed building has an association with its neighbouring scheduled monument (1002969). But does not have the same direct, functional relationship with the coast meaning that distant visibility of the project array areas would not give rise to change to the contribution of the setting to significance. Further assessment will not be undertaken.	40 to 50km	No
1001465	Grade II* Bawdsey Manor and Registered Park and Garden and associated listed buildings	Bawdsey Manor and associated listed buildings: walls of walled garden, gateways, orangery and gymnasium circa 40 yards north of Bawdsey Manor, <b>Bawdsey Manor Pulhamite Cliff structures, terrace walls and steps below Bawdsey Manor</b> , Tea House on the upper terrace circa 7 yards south west of Bawdsey Manor,	Bawdsey Manor and associated designated assets are positioned on the coastline c.40km from the turbines, where on clear days turbines may be visible from parts of the Manor. In most cases, this very distant visibility would not interact with the heritage interests of the assets and no effect would arise. <b>However, the role of the Registered Park and Garden and particularly the Pulhamite Cliff</b>	40 to 50km	Yes

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
		Receiver block at TM 3365 3803, Bawdsey Manor, former Stable Block at Bawdsey Manor	<b>structures as picturesque viewpoints supported by their coastal positioning means that these assets play a role in the area's setting which the installation of wind turbines have the potential to impact. As a result, the Registered Park and Garden and Pulhamite Cliff Structures will be further assessed (SLVIA VP10).</b>		
1002968/1377365	Scheduled Monument /Grade II Listed Building	<b>Martello tower at Felixstowe Ferry/ Martello Tower, Felixstowe Ferry</b>	<b>The distant visibility of the turbines from this Martello tower may give rise to adverse change in setting, although the area surrounding the Martello tower has been developed and the designed area of control for this tower relates primarily to the harbour mouth. Further assessment will be undertaken.</b>	40 to 50km	Yes
1006036/1030405	Scheduled Monument /Grade II Listed Building	<b>Martello tower on golf course adjoining Woodbridge Haven/ Martello Tower, South end of golf links</b>	<b>The distant visibility of the turbines from this Martello tower may give rise to adverse change in setting. However, this building is situated within a developed golf course and the designed area of control for this tower relates primarily to the river mouth. Further assessment will be undertaken.</b>	40 to 50km	Yes
	Conservation Area	Felixstowe	Felixstowe developed into a visitor destination in the late 19 <sup>th</sup> century. Though the distant visibility of turbines may give some rise to adverse change in setting, this would not be greatly impacted due to the town's tourism developing due to the natural spa well and the proximity of the area to the coast rather than any picturesque qualities of the view itself,	40 to 50km	No

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
			evident in the use of trees restricting sea views in the landscaping. Consequently, further assessment will not be undertaken (SLVIA VP11).		
1391640	Grade II* Listed Building	Bartlet Hospital / Martello Tower R	This Martello Tower has been built over and used as foundations as part of the Barlet Hospital complex largely if not totally altering its original setting. Further assessment will be undertaken.	40 to 50km	No
<b>1030375</b>	<b>Grade II Listed Building</b>	<b>No 14 (The Q Tower)</b>	<b>The distant visibility of turbines from this former Martello tower may give rise to an adverse change in setting, however, the tower is now situated within a densely developed area. the designed area of control for this tower relates primarily to the river mouth. Further assessment will be undertaken.</b>	<b>40 to 50km</b>	<b>Yes</b>
1001220	Park and Garden	Cliff Gardens and Town Hall Garden	The Cliff Gardens reflect Felixstowe's development into a visitor destination in the late 19 <sup>th</sup> century. Though the distant visibility of turbines may give some rise to adverse change in setting, this would not be greatly impacted due to the town's tourism developing due to the natural spa well and the proximity of the area to the coast rather than the view itself, evident in the use of trees restricting sea views in the landscaping. Further assessment will not be undertaken.	40 to 50km	No
<b>1006013/1284281</b>	<b>Scheduled Monument/</b>	<b>Martello tower at western end of sea front/Coastguard Station</b>	<b>The distant visibility of the turbines from this former Martello tower with a coastguard station</b>	<b>40 to 50km</b>	<b>Yes</b>

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
	Grade II Listed Building		building atop may give rise to adverse change in setting despite the modern development around the Martello tower. Further assessment will be undertaken.		
1018969/1030415	Scheduled Monument/ Grade I Listed Building	Landguard Fort and associated field works	The visibility of the turbines from Landguard Ford has some potential to adversely change the monument's setting, although the primary defensive focus of the fort is the estuary view over the harbour mouth and modern marine traffic is a principal element of views. Further assessment will be undertaken (SLVIA VP12).	40 to 50km	Yes
1017200	Scheduled Monument	The Dovercourt lighthouses and causeway	These lighthouses were historically used to guide ships towards Harwich harbour, but do not rely on specific views to the sea for significance and their primary architectural significance is in the visual prominence in views from the sea which would be unaffected by visibility of the turbines. Further assessment will not be undertaken.	40 to 50km	No
1165846	Grade II* Listed Building	Naze Tower	While the primary architectural significance of this assets is in its visual prominence in views from the land and sea which would be unaffected by visibility of the project array areas, it is a viewpoint which allows the historical pattern of the ports and resort towns along the Tendring and Suffolk coast to be seen. Further assessment will be undertaken (SLVIA VP13).	40 to 50km	Yes



NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
1455213	Grade II Listed Building	Old Lifeboat House	This asset is set well back from the seafront and although turbines may be distantly visible from the building, this will be of limited impact to setting due to the importance of the building's positioning reflecting the need for immediate access to the sea and its role as a lookout reflecting visibility of launching and recovering boats rather than distant views to sea. Further assessment will not be undertaken.	40 to 50km	No
-	Conservation Area	Walton	This conservation area focuses on the seafront with several of the areas surviving from Walton's development into a seaside resort from the mid-19th century. The seafront facades along the Parade, along with the near focus on the pier from the sea front promenade at Southcliff are the principal areas where visibility of the sea contributes to significance, and distant visibility of turbines in sequential views from these locations would not affect this contribution to significance.	40 to 50km	No
-	Conservation Area	Frinton on Sea	Frinton on Sea Conservation Area centres on the town's development into a seaside resort in the 1890s, though unlike neighbouring seaside resorts, Frinton has an 'absence of commercialism', and the fortuitous and planned architectural compositions of the seafront are the principal contributors to character. Important views are noted in the conservation area appraisal along the seafront, and turbines would not interact with these key views. At the proposed separation, the turbines will be visible only as very distant background elements of views	40 to 50km	No

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
			out to sea and would not interact with any contribution to significance. No further assessment will be undertaken (SLVIA VP14).		
-	Conservation Area	Clacton Seafront	Visibility of the proposed turbines may detract from designed and fortuitous architectural compositions within the conservation area, primarily the approach to pier at Clacton. These effects would primarily be experienced as an effect on the conservation area rather than on individual listed structures and therefore the Clacton conservation area will be further assessed (SLVIA VP15).	40 to 50km	<b>Yes</b>
1016555/1111520	Scheduled Monument/ Grade II Listed Building	Martello tower F, Marine Parade West, Clacton-on-Sea/Martello Tower and brick lined moat	This Martello tower is situated within a developed garden but retains views to the sea. There is some potential for change given the area's already developed setting. Further assessment will be undertaken.	40 to 50km	<b>Yes</b>
1016554/1337150	Scheduled Monument/ Grade II Listed Building	Martello tower E, 300m south west of junction of Marine Parade West and Wash Lane, Clacton-on-Sea/Martello Tower adjacent to sea wall, Butlins Holiday Village	The setting of this Martello tower is now heavily developed, but retains views to the sea. There is some potential for change despite the already developed setting. Further assessment will be undertaken.	40 to 50km	<b>Yes</b>
1016553/1111524	Scheduled Monument/ Grade II Listed Building	Martello tower D, 450m SSW of the Club House, Clacton Golf Course/Martello Tower, adjacent to sea wall Clacton Golf Course	This Martello tower retains views to the sea. There is some potential for change despite the already developed setting. Further assessment will be undertaken.	40 to 50km	<b>Yes</b>

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
1018954/1165569	Scheduled Monument/ Grade II Listed Building	Martello tower C, St Osyth Beach, Clacton-on-Sea/Martello Tower	This Martello tower retains views to the sea. There is some potential for change despite its already developed setting. Further assessment will be undertaken.	50 to 60km	<b>Yes</b>
1309070/1017052	Scheduled Monument/ Grade II Listed Building	Martello Tower A and associated battery, Stone Point	The immediate surroundings of this Martello tower are now heavily developed, and there are no ground level views to the proposed array. Views to the project area are over the intervening holiday park and the very distant visibility of the proposed turbines in these views would not give rise to any adverse effect. No further assessment will be undertaken.	50 to 60km	No
1110942	Grade I Listed Building	Chapel of St Peter on the Wall Bradwell	This asset has a strong sense of remoteness and time depth arising from its isolated position on the coast and visibility in long views from the north and west. Visibility of the proposed turbines would, however be as very distant elements of the background to views in which other onshore and offshore turbines are more prominently visible. The proposed turbines would not appear in views of the asset in a way that would affect this sense of isolation and as a result no effect is anticipated. No further assessment will be undertaken.	60km	No
1018784	Scheduled Monument	Reculver Saxon Shore fort, Anglo-Saxon monastery and associated remains	This asset has a sense of remoteness and time depth arising from its isolated position on the coast and visibility in long views from sea, with the paired towers having historically formed an important seamark in the Thames approach. Visibility of the	50 to 60km	No

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
			proposed turbines would, however be as very distant elements of the background to views in which other onshore and offshore turbines are visible in much closer proximity and modern marine traffic is a principal element of views. The proposed turbines would not appear in views of the asset in a way that would affect this sense of isolation and as a result no effect is anticipated. No further assessment will be undertaken.		
-	Conservation Area	Dovercourt	The Conservation Area encompasses the areas of the town centre associated to the early seaside resort. Multiple areas highlight the role of the sea in forming part of the area's character including Cliff Park presents an 'open aspect to the sea' with Mill Lane offering an archway framing the sea onto the Marine Parade. However, these nearshore views of the sea in Dovercourt should be limitedly impacted by the distant view of the turbines. No further assessment will be undertaken.	40 to 50km	No
-	Conservation Area	Birchington on Sea	The Birchington on Sea Conservation Area centres on The Square within the village itself away from the main coastline which reflects the oldest area of the village (some of the buildings dating to the medieval period). As a result, the proposed turbines would not greatly impact the setting of this Conservation Area. No further assessment will be undertaken.	40 to 50km	No
-	Conservation Area	Margate Seafront	Margate Seafront Conservation Area centres on the area adjacent to the coastline. At the proposed	40 to 50km	No

NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
			separation the turbines will not be visible in the setting of the Conservation Area with sufficient prominence to interact with any contribution to significance. No further assessment will be undertaken.		
-	Conservation Area	Clifftop	This Conservation Area focuses on the late Victorian/Edwardian Architecture on the clifftop which 'have been designed to make the best of the sea front aspect' and the principal contribution to significance is in views where this relationship can be seen rather than in the long views in which turbines would appear as very distant elements of the background. At the proposed separation the turbines will not be visible in the setting of the Conservation Area with sufficient prominence to interact with any contribution to significance. No further assessment will be undertaken.	40 to 50km	No
-	Conservation Area	Kingsgate	Kingsgate Conservation Area centres on the coast predominantly consisting of Joss Bay and the Port Regis area. At the proposed separation the turbines will not be visible in the setting of the Conservation Area with sufficient prominence to interact with any contribution to significance. No further assessment will be undertaken.	40 to 50km	No
1013380	Scheduled Monument	Artillery castle at Deal	Visibility to the north east is constrained from much of the asset by the 19 <sup>th</sup> -century seafront development; visibility would be very distant and beyond the visually detracting modern pier and the	50 to 60km	No



NHLE Ref.	Type	Name	Rationale	Distance	Scoped in
			existing Thanet Offshore windfarm. At the proposed separation the turbines will not be visible in the setting of the Conservation Area with sufficient prominence to interact with any contribution to significance. No further assessment will be undertaken.		
1013381	Scheduled Monument	Artillery castle at Walmer	Visibility to the north east is precluded from much of the asset by the modern garden planting; visibility would be very distant and beyond the existing Thanet Offshore windfarm. At the proposed separation the turbines will not be visible in the setting of the Conservation Area with sufficient prominence to interact with any contribution to significance. No further assessment will be undertaken.	50 to 60km	No

18. In summary, the following assets are proposed to be taken forward to the offshore settings assessment:
- The chain of Martello Towers between Slaughden (Aldeburgh) and Jaywick;
  - Orford Castle (1014860/1030873);
  - Battery Observation Post, Bawdsey (1389463);
  - Bawdsey Manor Registered Park and Gardens (1001465) and Bawdsey Manor Pulhamite Cliffs (1406805);
  - Landguard Fort (1018969/1030415);
  - Naze Tower (1165846); and
  - Clacton Seafront Conservation Area.

## 5 References

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## **HARNESSING THE POWER OF NORTH SEA WIND**

*North Falls Offshore Wind Farm Limited*

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