



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

**Appendix I2 to the Relevant Representations of Natural England
Seascape, Landscape and Visual Impact Assessment**

For:

The construction and operation of the North Falls Offshore Wind Farm located
approximately 40 km off the Suffolk Coast in the Southern North Sea.

Planning Inspectorate Reference EN010119

18 February 2025

Appendix I2 – Seascape, Landscape and Visual Impact Assessment

In formulating these comments, the following documents have been considered:

- [APP-043] 3.1.31 Environmental Statement Chapter 29 Seascape, Landscape and Visual Impact Assessment
- [APP-077] 3.2.25 Environmental Statement Chapter 29 Figures Part 1 of 6

Glossary of Acronyms and Abbreviations

<u>EIA</u>	<u>Environmental Impact Assessment</u>
<u>ES</u>	<u>Environmental Statement</u>
<u>LCT</u>	<u>Landscape Character Type</u>
<u>NL</u>	<u>National Landscape</u>
<u>NP</u>	<u>National Park</u>
<u>OWF</u>	<u>Offshore Wind Farm</u>
<u>SECHNL</u>	<u>Suffolk & Essex Coast and Heaths National Landscape</u>
<u>SHC</u>	<u>Suffolk Heritage Coast</u>
<u>SLVIA</u>	<u>Seascape Landscape and Visual Impact Assessment</u>
<u>WTG</u>	<u>Wind Turbine Generator</u>

Please note: This additional Appendix should be read in conjunction with Appendix I submitted into Examination on 18 October 2024, and our Principal Areas of Disagreement Summary Statement (PADSS) contained within the cover letter to the same Relevant Representations [RR-243].

1. Natural England's Advice and Recommendations

A summary of Natural England's key concerns in relation to Seascape, Landscape and Visual Impact Assessment is set out in Table 1. Our detailed advice and recommendations are presented in further detail in Table 2. A comparison of the Applicant's judgements and Natural England's judgements regarding the significance of landscape and visual effects are set out in Table 3. Indicative apparent heights in degrees for Viewpoints 1 to 10 given turbine heights of 377m and 276m are set out in Table 4.

Natural England is the Government's statutory adviser on landscape, the designating authority for National Parks (NPs) and National Landscapes (NL) (formerly Areas of Outstanding Natural Beauty), and the defining authority for Heritage Coasts in England.

Natural England's comments relate only to seascape, landscape, and visual effects associated with the statutory purpose of the Suffolk Coast and Heaths National Landscape (SECHNL), the special character of the Suffolk Heritage Coast (SHC), and their seascape settings. The presence and special character of the SHC within the SECHNL helps to define that part of the designated area which is most likely to experience significant adverse effects arising from the North Falls scheme. Although a defined rather than a designated landscape, the SHC covers a geographical area, which lies wholly within the SECHNL. To understand the likely extent of the indirect onshore influence of the North Falls scheme it is therefore helpful to refer to the boundary of the SHC.

Table 1 Summary of Key Issues – Seascape, Landscape and Visual Impact Assessment.

NE Ref	Summary of Key Concerns	Natural England's Recommendations to Resolve Issues.	Risk
I1	<p><u>Design changes and impacts to the SECHNL and SHC</u> Natural England welcomes the removal of the northern array area, the reduction in maximum blade tip height, and the reduction in the number of WTGs proposed for the remaining southern array area. The design as proposed in the ES significantly decreases the risk of further harm to the natural beauty of the SECHNL and the special character of the SHC from the North Falls project. Despite this, we advise that <u>there remains insufficient information to discount significant impacts</u> to landscape and visual receptors within the SECHNL and SHC from turbines within the remaining southern array area.</p>	<ul style="list-style-type: none"> • To understand the potential impacts from the North Falls OWF on the natural beauty of the SECHNL, the implications for the special qualities <u>must be fully assessed</u> within an updated SLVIA. • Impacts on the special character of the SHC <u>must be assessed</u> within an updated SLVIA. 	
I2	<p><u>The SLVIA conclusions</u> Natural England disagrees with the SLVIA conclusions of:</p> <ul style="list-style-type: none"> • no significant effects on special qualities of the SECHNL • no significant effects on the landscape character of onshore Landscape Character Types (LCTs) within the SECHNL and SHC • the significance of visual effects particularly between Orford Ness and Bawdsey Manor. • no significant cumulative impacts on landscape character or special qualities • the significance of cumulative visual effects particularly between Orford Ness and Bawdsey Manor. • The significance of impacts on people using the Suffolk Coast Path. 	<p>The Applicant should revise the assessment in accordance with detailed advice in Table 2, comments A to H.</p>	
I3	<p><u>The acceptability of further harm to the seascape setting of the SECHNL, and the special character of the SHC</u> We advise that the Examining Authority considers the acceptability of further harm to the seascape setting of the SECHNL, and the special character of the SHC, given that the statutory purposes of</p>	<p>We advise that the Applicant clearly sets out the additional harm that the North Falls OWF will present to the statutory purpose of the SECHNL and special character of the SHC, taking into consideration the advice provided.</p>	

NE Ref	Summary of Key Concerns	Natural England's Recommendations to Resolve Issues.	Risk
	the designation are already compromised. The statutory purpose of the SECHNL is to conserve and enhance. Adding further offshore wind turbines into the seascape setting of the SECHNL and SHC will not conserve and enhance the natural beauty of the designation or positively contribute to the special character of the Heritage Coast; it will degrade these areas further. Therefore, it is necessary to understand how much extra damage to the special qualities the turbines of the North Falls proposal will cause.		
I4	<u>It is not clear how the project proposes to enable the decision-maker to further the purposes of the SECHNL, and in doing so discharge its duties under the Levelling Up and Regeneration Act (2023).</u>	We advise the Applicant clearly sets out how the project proposes to enable the decision-maker to further the purposes of the national landscape.	

Table 2 Natural England's Detailed Advice and Recommendations – Seascape, Landscape and Visual Impact Assessment.

Seascape and Landscape Visual Impact Assessment

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
<p>The Suffolk Coast and Heaths National Landscape and the Suffolk Heritage Coast.</p>	I5		<p><u>The potential impacts from the North Falls OWF on the natural beauty of the SECHNL are not fully assessed within the SLVIA. Without this NE cannot agree with the Applicants assessment of no significant effects on special qualities.</u></p> <p>Table 29.21 summarises the Applicant's judgement of the significance of impacts to special qualities as "<i>moderate-minor effects on the special qualities of the SECHNL, which is not significant in EIA terms</i>". However, it is not clear which special qualities may be associated with potential moderate-minor effects, and how the impact of the project on each special quality has been assessed.</p> <p>The Applicant does acknowledge that each special quality may interact with the proposed project differently, and Natural England agrees with this. For instance, the Applicant describes in Table 29.21 that "<i>taking a precautionary approach to the assessment, the scale of</i></p>	<p>The Applicant should in an updated assessment:</p> <ul style="list-style-type: none"> • Provide the methodology for how special qualities have been assessed. • Provide an assessment of the potential impact from the project to each relevant special quality. • Use this assessment to form a conclusion on the significance of impacts to special qualities. 	

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			<p><i>change on certain perceptual aspects of the SECHNL special qualities is judged to be medium, although other special qualities will be entirely unchanged". However, the interactions between special qualities and the project are not described within the Environmental Statement (ES).</i></p> <p>As a result, it is unclear what the impact of the North Falls project will have on the natural beauty of the SECHNL, for instance in terms of landscape quality, scenic quality, relative wildness, or relative tranquillity.</p>		
	16		<p><u>Natural England advises that the impacts of the North Falls OWF on the special character of the SHC is not assessed within the SLVIA.</u></p> <p>We note that Table 29.21 states that "<i>Special qualities for the Suffolk Heritage Coast are not defined. For the purposes of this assessment, they are assumed to be similar to those for the SECHNL above</i>". We advise that Heritage Coasts do not have special qualities. Instead, Heritage Coasts are defined by their special characters and the natural beauty of the area. The purpose of Heritage Coasts is clarified on</p>	The Applicant should provide an updated assessment of the potential impacts to the SHC within the SLVIA.	

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			<p>the .gov website here: Heritage coasts: definition, purpose and Natural England's role - GOV.UK (www.gov.uk). Further, the need for the Applicant to specifically consider impacts to Heritage Coasts within the SLVIA is noted within EN-1 (5.6.13, 5.10.10 and 5.10.11) and EN-3 (para 2.8.205, and 2.8.208) as we consider the absence of this assessment is a significant omission.</p> <p>The presence and special character of the SHC within the SECHNL helps to define that part of the designated area which is most likely to experience significant adverse effects arising from the North Falls scheme. Although a defined rather than a designated landscape, the SHC covers a geographical area, which lies wholly within the SECHNL.</p> <p>The special character of the Suffolk Heritage Coast is defined through evidence such as the Suffolk Coast and Heaths National Character Area (Suffolk Coast and Heaths - National Character Area Profiles), local Landscape Character Assessments, and the natural beauty of the National Landscape it overlaps with.</p>		

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			To understand the likely extent of the indirect onshore influence of the North Falls scheme, it is therefore the boundary of the SHC that should be regarded within the assessment.		
	17		<p><u>It is not clear how the project proposes to enable the decision-maker to further the purposes of the SECHNL.</u></p> <p>Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty ("National Landscape") in England, to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in preparing development plans, making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers in undertaking their functions.</p> <p>Defra have released 'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes' (December 2024)</p>	The Applicant should provide clarity on how the project proposes to enable the decision-maker to further the purposes of the National Landscape. Furthermore, we advise that any opportunities for enhancement in line with the Protected Landscapes Management Plan should be explored and secured as part of the Development Consent Order.	

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Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			<p>and, in accordance with that guidance, Natural England advises that:</p> <ul style="list-style-type: none">• The duty to 'seek to further' is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (National Park, the Broads, or a National Landscape (formerly AONB)) can be furthered;• The new duty underlines the importance of avoiding harm to the statutory purposes of a Protected Landscape and also to seek to further the conservation and enhancement of a Protected Landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with proportionate, reasoned and documented evidence what measures can be taken to further the statutory purpose;• The proposed measures to further the statutory purposes of a Protected Landscape, should explore what is		

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			possible <u>in addition</u> to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. Natural England's view is that the proposed measures should align with and help to deliver the aims and objectives of the Protected Landscape's statutory management plan, which is reinforced in the Defra guidance. The relevant Protected Landscape team/body should be consulted.		
	18		<u>Underestimated visual effects</u> We advise that significance of effects (in EIA terms) from the North Falls OWF on visual receptors at viewpoints from Orford Ness to Bawdsey Manor (located within the SECHNL and SHC) have been underestimated. Natural England's judgements (Table 3) have been informed by our experience of other offshore wind farms supported by the apparent	The Applicant should review Table 3 and update the assessment accordingly.	

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			height calculations of the proposed North Falls turbines at these viewpoints (Table 4).		
	I9		<p><u>Orford Ness</u></p> <p>Natural England's judgement is that the sensitivity of Orford Ness is high, not medium-high as judged by the applicant because the SECHNL is a nationally protected landscape which has been designated for its natural beauty and has a statutory purpose to conserve and enhance that natural beauty. The SHC is a nationally defined landscape because of its special character, of which natural beauty is one element. The criteria used by the Applicant to judge this receptor as having a medium-high sensitivity has not been clearly articulated within Table 29.29.</p>	Natural England advises that based on the information presented we cannot support the sensitivity of medium-high that has been assigned to Orford Ness and advise that this is amended to high.	
	I10		<p><u>Suffolk Coast Path.</u></p> <p>This stretch of coastline offers the opportunity for high quality views out to sea, and the availability of this experience allows people to enjoy the natural beauty for which the SECHNL was designated. The natural beauty indicator scenic quality highlights the <i>'long distance and panoramic views including out to sea and along the Heritage Coast'</i> which are</p>	The Applicant should reconsider their assessment in the light of Natural England's advice.	

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			<p>available from within the designation; these views are highly susceptible to changes in seascape character.</p> <p>The Applicants assessment of sequential impacts to users of the Suffolk Coast Path states <i>"From the southern coastal section, scale differences will be more apparent and the Offshore Above sea Development will contribute somewhat to 'curtaining' of the skyline, though it occupies a modest extent of the skyline. In this southern coastal section (between the mouth of the Butley River and Landguard Point) the cumulative magnitude of change in views arising from the contribution of the Offshore Above-sea Development is judged to be medium. The cumulative effect is predicted to be moderate, which is significant in EIA terms."</i></p> <p>Natural England agree that the cumulative effect is significant in EIA terms, however considers the impact to be major adverse given the potential for the North Falls project to affect the special qualities (which are not fully assessed within the ES), taking the designated landscape further away from its required state.</p>		

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Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
	I11		<p><u>Impacts on Landscape Character</u></p> <p>Natural England disagrees with the Applicant's judgements in relation to the three Landscape Character Typologies taken forward for assessment. Natural England's judgement is that impacts on the following character areas is likely to be moderate and significant in EIA terms:</p> <ul style="list-style-type: none">• Coastal dunes and shingle ridges;• Coastal levels;• Saltmarsh and inter-tidal flats. <p>Please see Table 3 for Natural England's reasoning.</p>	The Applicant should update their assessment in the light of Natural England's reasoning.	
	I12		<p><u>Cumulative impacts</u></p> <p>We disagree that the North Falls OWF will have no significant cumulative impacts on the SECHNL and SHC. The Applicant's own assessment concludes moderate significant sequential effects on users of the Suffolk Coast Path within the protected landscape. Natural England's judgements are described in Table 3.</p> <p><u>Natural England's position on the current ES design:</u></p>	Applicant to update assessment.	

Natural England's Key Considerations	Natural England's Advice				
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			<p><u>377.4m turbines</u></p> <p>The proposed turbines located within the remaining southern array area will introduce a sense of industrialisation and clutter into the seascape setting of the SECHNL. However, the adverse influence of these turbines will likely be confined to a stretch of coastline from the southern coast limit of the SECHNL (Old Felixstowe) to Orford Ness. However, their presence in the seascape setting of the SECHNL will further degrade the quality of views out to sea. When seen from Orford Ness their size, combined with the marked contrast in height with the existing arrays, will create a visually incoherent and cluttered seascape, leading to further loss of the sense of wildness and tranquillity.</p> <p><u>276.4m turbines</u></p> <p>The turbines located in the remaining southern array area are unlikely to have a significant effect on the special qualities of the SECHNL and special character of the SHC alone, although they will add to the visible presence of the Galloper OWF and Greater Gabbard OWF arrays and should be considered in the</p>		

Natural England's Key Considerations		Natural England's Advice			
Relevant and Written Representations on ES Chapter 29 Seascape, Landscape and Visual Impact Assessment.	NE Ref	ES Ref	Comment	Recommendation.	Risk (RAG)
			context of their impact adding to the wider visually incoherent and cluttered seascape described above.		

Table 3: A comparison of the Applicant's judgement and Natural England's judgement regarding the significance of landscape and visual effects. Judgements made by both parties at the PEIR stage are indicated in black, and any updated judgements (the current position) are indicated in red. If not indicated (in red), judgements remain the same (in black).

Feature		Sensitivity of receptor		Magnitude of change		Significance of effect		Total cumulative impact	
		Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement
Landscape Character Types	Coastal dunes and shingle ridges	High	Agree	Medium within 30km of proposals Low along the coastal edge	Disagree – 30km threshold of significance not explained Disagree – Medium. There is the potential for additional visible infrastructure to interfere with the “vast open uncluttered landscape”, a key characteristic of the ‘coastal dunes and shingle ridges’ landscape character type (see Coastal dunes & shingle ridges - Suffolk Landscapes). A major driver of change to this characteristic	Moderate Adverse Moderate-minor	Disagree – major adverse Disagree – moderate (significant).	Moderate Adverse Moderate-minor	Disagree – major adverse Disagree – moderate (significant).

Feature		Sensitivity of receptor		Magnitude of change		Significance of effect		Total cumulative impact	
		Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement
					of the is the construction of wind turbines offshore.				
	Coastal levels	High	Agree	Medium within 30km of proposals Low along the coastal edge	Disagree – 30km threshold of significance not explained Disagree – Medium. There is the potential for additional visible infrastructure to interfere with the existing long views to the horizon. (see Guidance note Coastal levels)	Moderate Adverse Moderate-minor	Disagree – major adverse Disagree – moderate (significant).	Moderate Adverse Moderate-minor	Disagree – major adverse Disagree – moderate (significant).
	Saltmarsh and inter-tidal flats	High	Agree	Medium within 30km of proposals Low along the coastal edge	Disagree – 30km threshold of significance not explained Disagree – Medium. Further visible offshore infrastructure has the potential for impacts to the	Moderate Adverse Moderate-minor	Disagree – major adverse Disagree – moderate (significant).	Moderate Adverse moderate-minor	Disagree – major adverse Disagree – moderate (significant).

Feature		Sensitivity of receptor		Magnitude of change		Significance of effect		Total cumulative impact	
		Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement
					<i>“Powerful sense of isolation and wildness” (see Guidance Note Saltmarsh and Intertidal Flats)</i>				
National Landscape Designation	Suffolk Coast and Heaths AONB	High	Agree	Medium, for areas within 30km of the Offshore Above-sea Development and along the coastal edges of the AONB. Low along the coast, and negligible further inland	Disagree – major adverse. 30km threshold of significance not explained, special qualities not assessed. Disagree – Medium. Impacts on the Special qualities have not been assessed, therefore evidence to support the Applicant's judgement on significance is missing.	<i>“Moderate adverse, which is significant in EIA terms, effects are predicted on certain perceptual qualities, where the relationship with the sea is a stronger influence, along the coastal edge of the AONB and within 30km.”</i> Moderate-minor effects on the special qualities of the SECHNL, which is not significant in EIA terms. These effects will be localised to the coastal strip between Bawdsey Manor and Orford Ness.	Disagree – Major adverse. Disagree – moderate (significant).	Moderate Adverse Moderate-minor	Disagree – major adverse Disagree – moderate (significant).
Suffolk Coastal Path	Suffolk Coastal Path	Medium-High High	Disagree - High	Significant for viewpoints 4, 5, 9, 10 and 17	Disagree – significant for the continuous stretch of	Moderate adverse, which is significant in EIA terms, effects are predicted where the	Disagree - Major adverse	Moderate Adverse	Disagree – major adverse

Feature		Sensitivity of receptor		Magnitude of change		Significance of effect		Total cumulative impact	
		Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement
				Medium between Butley River and Old Felixstowe	SECHNL/SHC coastline between viewpoints 1 to 10 and 17. Disagree – High.	Suffolk Coastal Path follows the coastal edge, between Sizewell Beach and Bawdsey Manor. Moderate (significant) between Butley River and Landguard Point, not significant elsewhere.		Moderate adverse and significant, from a section of the path between the mouth of the Butley River and Landguard Point (19km)	
SLVIA Viewpoints	Covehithe	Medium-High High	Disagree – High Agree	Low Negligible	Disagree – Medium-High Agree	Minor Adverse Negligible (not significant).	Disagree – Moderate – Major Adverse Agree	Moderate Adverse Negligible (not significant).	Disagree – Major adverse Agree
	Southwold Pier (Heritage Coast)	Medium-High High	Disagree – High Agree	Low Negligible	Disagree – Medium-High Agree	Minor Adverse Negligible (not significant).	Disagree – Moderate – Major Adverse Agree	Moderate Adverse Negligible (not significant).	Disagree – Major adverse Agree
	Dunwich Coastguard cottage	Medium-High High	Disagree – High Agree	Low	Disagree – Medium – High Agree	Minor Adverse Minor (not significant)	Disagree – Major Adverse Agree	Moderate Adverse Minor (not significant)	Disagree – Major adverse Agree
	Sizewell Beach	Medium-High High	Disagree – High Agree	Medium Low	Disagree – High Agree	Moderate Adverse Minor (not significant)	Disagree – Major Adverse Agree	Moderate Adverse Minor (not significant)	Disagree – Major adverse Agree

Feature		Sensitivity of receptor		Magnitude of change		Significance of effect		Total cumulative impact	
		Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement
	Cliffs above Thorpeness	Medium-High High	Disagree – High Agree	Medium Low	Disagree – High Disagree - Medium	Moderate Adverse Minor (not significant)	Disagree – Major Adverse Disagree - Moderate – minor (not significant)	Moderate Adverse Minor (not significant)	Disagree – Major adverse Disagree - Moderate – minor (not significant)
	Aldeburgh	Medium-High High	Disagree – High Agree	Medium Low	Disagree – High Disagree - Medium	Moderate Adverse Minor (not significant)	Disagree – Major Adverse Disagree - Moderate – minor (not significant)	Moderate Adverse Minor (not significant)	Disagree – Major adverse Disagree - Moderate – minor (not significant)
	Orford Castle	Medium-High High	Disagree – High Agree	Medium-Low Low	Disagree – High Disagree - Medium	Minor Adverse Minor (not significant)	Disagree – Major Adverse Disagree - Moderate – minor (not significant)	Minor Adverse No cumulative effects are predicted.	Disagree – Major adverse Disagree - Moderate – minor (not significant)
	Orford Ness	Medium-High	Disagree – High	Medium	Disagree – High	Moderate Adverse Moderate (significant)	Disagree – Major Adverse	Moderate Adverse Moderate (significant)	Disagree – Major adverse
	Shingle Street	Medium-High High	Disagree – High Agree	Medium	Disagree – High	Moderate Adverse Moderate (significant)	Disagree – Major Adverse	Moderate Adverse	Disagree – Major adverse

Feature		Sensitivity of receptor		Magnitude of change		Significance of effect		Total cumulative impact	
		Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement	Applicant's Judgement	NE Judgement
								Moderate (significant)	
	Pulhamite Cliffs (Bawdsey Manor)	Medium-High High	Disagree – High Agree	Medium	Disagree – High	Moderate Adverse Moderate (significant)	Disagree – Major Adverse	Moderate Adverse Moderate (significant)	Disagree – Major adverse

Table 4: Apparent heights in degrees for Viewpoints 1 to 10 given turbine heights of 377m and 276m. Natural England has highlighted any figures above 0.4 degrees in bold within the table, as we consider apparent heights of above 0.4 degrees to be potentially significant.

Viewpoint		Viewpoint height above sea level in meters	NE estimated distance between viewpoint and North Falls OWF south array in meters	Apparent height in degrees (southern array area)
Proposed turbine height to blade tip in meters – 377m				
1	Covehithe	4	67000	0.122
2	Southwold Pier	0	63000	0.102
3	Dunwich Coastguard Cottages	14	56000	0.268
4	Sizewell Beach	4	52000	0.272
5	Cliffs above Thorpeness	10	47000	0.362
6	Aldeburgh	5	45000	0.368
7	Orford Castle	9	43000	0.415
8	Orford Ness	4	39000	0.458
9	Shingle Street	4	39000	0.458
10	Pulhamite Cliffs (Bawdsey Manor)	4	39000	0.458
Proposed turbine height to blade tip in meters 276m				
1	Covehithe	4	67000	0.036

2	Southwold Pier	0	63000	0.011
3	Dunwich Coastguard Cottages	14	56000	0.165
4	Sizewell Beach	4	52000	0.160
5	Cliffs above Thorpeness	10	47000	0.238
6	Aldeburgh	5	45000	0.239
7	Orford Castle	9	43000	0.280
8	Orford Ness	4	39000	0.310
9	Shingle Street	4	39000	0.310
10	Pulhamite Cliffs (Bawdsey Manor)	4	39000	0.310