



**N O R T H F A L L S**

*Offshore Wind Farm*

# **Assessment of the Special Qualities of the Suffolk and Essex Coast and Heaths National Landscape and Suffolk Heritage Coast – Technical Note**

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## Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
NE	Natural England
OWF	Offshore Wind Farm
SECHNL	Suffolk and Essex Coast and Heaths National Landscape
SHC	Suffolk Heritage Coast
SLVIA	Seascape, Landscape and Visual Impact Assessment
ZTV	Zone of Theoretical Visibility

## Glossary of Terminology

Array Area	The offshore wind farm area, within which the wind turbine generators, array cables, platform interconnector cable, offshore substation platform(s) and/or offshore converter platform will be located.
The Applicant	North Falls Offshore Wind Farm Limited (NFOW).
The Project Or 'North Falls'	North Falls Offshore Wind Farm, including all onshore and offshore infrastructure.

# 1 Introduction

## 1.1 Background

1. This technical note has been prepared in response to Appendix I2 to the Relevant Representation of Natural England Seascape, Landscape and Visual [REP1-071] and the associated Risk and Issues Log [REP1-070]. The Applicant's response to the other points raised by Natural England is provided in Applicant's Response to Appendix I2 to the Relevant Representation of Natural England Seascape, Landscape and Visual Impact Assessment (Rev 0) [REP2-024]. This technical note responds specifically to Natural England's points I5 and I6 (Applicant's reference NE-405 and NE-406), regarding effects on the Suffolk and Essex Coast and Heaths National Landscape (SECHNL) and the Suffolk Heritage Coast (SHC).
2. Other points raised by Natural England in [REP1-071] are referenced in this document, where relevant to the consideration of effects on the SECHNL and SHC.
3. This technical note should be read alongside the Environmental Statement (ES) Chapter 29 Seascape, Landscape and Visual Impact Assessment (SLVIA) [APP-043], and Appendix 29.1 SLVIA and VM [APP-170] which sets out the methodology used to undertake the SLVIA.

## 1.2 Natural England Relevant Representation

4. Natural England's comments and recommendations on points I5 and I6 are noted in Table 1 below, taken from [REP1-071].

**Table 1 Natural England Relevant Representation in relation to SECHNL and SHC**

Natural England Reference	Applicant's Reference	Natural England Comment	Natural England Recommendation
I5	NE-405	<p>The potential impacts from the North Falls Offshore Wind Farm (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.</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 change on certain perceptual aspects of the SECHNL</i></p>	<p>The Applicant should in an updated assessment:</p> <ul style="list-style-type: none"><li>• Provide the methodology for how special qualities have been assessed.</li><li>• Provide an assessment of the potential impact from the project to each relevant special quality.</li><li>• Use this assessment to form a conclusion on the significance of impacts to special qualities.</li></ul>

Natural England Reference	Applicant's Reference	Natural England Comment	Natural England Recommendation
		<p><i>special qualities is judged to be medium, although other special qualities will be entirely unchanged</i>". However, the interactions between special qualities and the project are not described within the Environmental Statement (ES).</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>	
I6	NE-406	<p>Natural England advises that the impacts of the North Falls OWF on the special character of the SHC is not assessed within the SLVIA.</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 the .gov website here: Heritage coasts: definition, purpose and Natural England's role - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>). 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 SHC 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> <p>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.</p>	The Applicant should provide an updated assessment of the potential impacts to the SHC within the SLVIA.

### 1.3 The Applicant's Position

5. The Applicant considers that the assessment of effects on the SECHNL, presented in Table 29.21 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [**APP-043**] is robust, as set out in the Applicant's previous response to Natural England (see Applicant's Response to Relevant Representations from Natural England [**REP1-044**], Applicant's ref **NE-42**).
6. The Applicant considers that the assessment of effects on the SECHNL referred to above combined with the assessment of effects on landscape character presented in Section 29.6.3.2.1 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [**APP-043**], is a sufficient basis on which to conclude that effects on the SHC will not be significant.
7. To assist the Examining Authority, this technical note provides supplemental information regarding the assessment of effects on the special qualities of the SECHNL, setting out methodology, potential impact in relation to each special quality, and conclusions on the significance of effects. It also provides supplemental information regarding the assessment of effects on the SHC.

### 1.4 Scope and approach

8. Section 2 of this technical note reviews ES Chapter 29 Seascape and Landscape Visual Impact Assessment [**APP-043**] findings in relation to effects on views from within the SECHNL and SHC, with reference to:
  - Viewpoints within the SECHNL and SHC with further commentary in relation to the findings of visual (and cumulative) effects and issues raised in [**REP1-071**] (see Table 2).
  - Sequential and cumulative sequential effects on the Suffolk Coastal Path, where this passes through the SECHNL/SHC, and further commentary in relation to issues raised in [**REP1-071**] (see Table 3).
9. Section 1.2 presents supplemental information responding to NE comments I5 and I6 in [**REP1-071**], including:
  - Discussion of methodology used to assess effects on special qualities of the SECHNL;
  - Potential effects (including cumulative) on each of the defined special qualities of the SECHNL, and further commentary in relation to issues raised in the NE Relevant Representation (see Table 4); and
  - Consideration of the special character of the SHC with reference to key landscape characteristics and their relationship with the natural beauty of the SECHNL (see Table 5).
10. This technical note concludes with a summary (Section 4) which reports the overall conclusion on the significance of effects (including cumulative) on the

special qualities of the SECHNL, and significance of effects on the special character of the SHC.

11. This technical note is supported by the following new figures:
  - Figure 1: Suffolk and Essex Coast and Heaths National Landscape Context;
  - Figures 2a, 2b and 2c: Suffolk Heritage Coast Landscape Context.

## 2 Assessment of Effects On Views

### 2.1 Effects assessed at viewpoints in the SECHNL and SHC

12. Viewpoints 1-10 in the ES Chapter 29 Seascape and Landscape Visual Impact Assessment [**APP-043**] are within both the SECHNL and the SHC, as shown in Figures 1 and 2a, 2b and 2c. Table 2 summarises the assessment findings for these viewpoints. Where NE have offered alternative levels of significance in their Table 3 in [**REP1-071**], judgements have been reviewed and further commentary is provided. Other than calculations of 'apparent height', presented in their Table 4, the Applicant notes that Natural England (NE) present no justification for their alternative assessments.

**Table 2 Effects assessed at viewpoints in the SECHNL and SHC**

Viewpoint Name	Distance from Array Area (km)	Sensitivity	Magnitude of change	ES Chapter 29 SLVIA Findings	Commentary
Viewpoint 1 - Covehithe	66	High	Negligible	Negligible (not significant)	NE have raised no issue with findings.
Viewpoint 2 - Southwold Pier	62	High	Negligible	Negligible (not significant)	NE have raised no issue with findings.
Viewpoint 3 - Dunwich Coastguard Cottages	55	High	Low	Minor (not significant)	NE have raised no issue with findings.
Viewpoint 4 - Sizewell Beach	50.8	High	Low	Minor (not significant)	NE have raised no issue with findings.
Viewpoint 5 - Cliffs above Thorpeness	48.5	High	Low	Minor (not significant)	NE state that, although effects would be greater (moderate-minor), they would remain not significant.
Viewpoint 6 - Aldeburgh	45.6	High	Low	Minor (not significant)	NE state that, although effects would be greater (moderate-minor), they would remain not significant.
Viewpoint 7 - Orford Castle	42.5	Medium-high	Low	Minor (not significant)	NE state that, although effects would be greater (moderate-minor), they would remain not significant.
Viewpoint 8 - Orford Ness	40.1	Medium-high	Medium	<b>Moderate (significant)</b>	<p>NE state that sensitivity is high, the magnitude of change is also high, and that effects would be major (significant).</p> <p>A medium-high sensitivity is judged to be appropriate for this receptor. Sensitivity is defined by combining judgements on susceptibility of the receptor, and value. With regards to susceptibility, the receptor is recreational and located within the Orford Ness National Trust Nature Reserve. Access to this location is somewhat restricted via a ticketed ferry. Whilst receptors at this location will experience coastal views, the focus of views is more likely to be on nearby wildlife and the various built structures. The assessment acknowledges that the viewpoint is in the SECHNL, indicating a higher value.</p>

Viewpoint Name	Distance from Array Area (km)	Sensitivity	Magnitude of change	ES Chapter 29 SLVIA Findings	Commentary
					<p>Given the viewing distance (40.1km) and context of views (in which existing offshore wind farms are currently visible) a medium scale of change is predicted. The magnitude of change is correctly recorded as medium, with reference to Table 1.11 of the ES Appendix 29.1 Seascape and Landscape Visual Impact Assessment and Visualisation Methodology [APP-170]: the project would represent a “clearly perceptible change in view”. The change does not meet the definition of high: “Large change in view, perhaps where the development is in close proximity in a direct line of vision, or affecting a substantial part of the view, or providing contrast with the existing view.”</p> <p>It is also recognised that the project will only be visible in conditions of ‘excellent atmospheric visibility’.</p> <p><b>It is judged that effects will be just above the threshold of significance, at Moderate.</b></p>
Viewpoint 9 - Shingle Street	40.8	High	Medium	<b>Moderate (significant)</b>	<p>NE state that the magnitude of change is high, and that effects would be major (significant).</p> <p>Given the viewing distance (40.8km) and context of views (in which existing offshore wind farms are currently visible) the project will result in a noticeable but not extensive change in the view. The magnitude of change is correctly recorded as medium, not high, with reference to Table 1.11 of the ES Appendix 29.1 Seascape and Landscape Visual Impact Assessment and Visualisation Methodology [APP-170] as set out for Viewpoint 8.</p> <p>It is also recognised that the project will only be visible in conditions of ‘excellent atmospheric visibility’.</p> <p><b>It is judged that effects will be just above the threshold of significance, at Moderate.</b></p>
Viewpoint 10 - Pulhamite Cliffs (Bawdsey Manor)	40.5	High	Medium	<b>Moderate (significant)</b>	<p>NE state that the magnitude of change is high, and that effects would be major (significant).</p> <p>Given the viewing distance (40.5km) and context of views (in which existing offshore wind farms are currently visible) the project will result in a noticeable but not extensive change in the view. The</p>

Viewpoint Name	Distance from Array Area (km)	Sensitivity	Magnitude of change	ES Chapter 29 SLVIA Findings	Commentary
					<p>magnitude of change is correctly recorded as medium, not high, with reference to Table 1.11 of ES Appendix 29.1 Seascape and Landscape Visual Impact Assessment and Visualisation Methodology [APP-170] as set out for Viewpoint 8.</p> <p>It is also recognised that the project will only be visible in conditions of 'excellent atmospheric visibility'.</p> <p><b>It is judged that effects will be just above the threshold of significance, at Moderate.</b></p>

## 2.2 Sequential Effects from the Suffolk Coastal Path

13. The following table reviews the findings of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] for the Suffolk Coastal Path, a section of which passes through the SECHNL and SHC (refer to Figure 1 and 2a, 2b and 2c). Quoted text is from Table 29.38 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043]. Comments raised by NE in [REP1-071] are noted, and further commentary from the Applicant is provided.

**Table 3 Sequential Effects from the Suffolk Coastal Path**

ES Chapter 29 Seascape and Landscape Visual Impact Assessment Cumulative Findings	NE Response	Further Commentary
When visible on clear days, the Offshore Above-sea Development will be seen to the south of the Galloper and Greater Gabbard cluster, from coastal edge sections of the Suffolk Coast Path. The relationship (and gaps between) the various schemes will change as walkers move along the coastal edge. From the northern coastal section, the additional effect of the Offshore Above-sea Development will be minor and not significant, due to distance and the narrow angle of view it occupies. From the inland sections there will be no change. 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. The cumulative effect within other sections of the route will not be significant.	<i>"Natural England agree that the cumulative effect [on users of the Suffolk Coast Path] 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...  The Applicant should reconsider their assessment in the light of Natural England's advice."</i>	<p>Moderate and significant sequential (and cumulative) effects have been identified from southern parts of the Suffolk Coastal Path. This includes a section of path between the mouth of the Butley River, then moving south towards Felixstowe within the SECHNL.</p> <p>Given the viewing distance (with the path generally being no closer than 40km to the Offshore Above Sea Development) and context of views (with other existing offshore wind farms influencing character) a magnitude of change no greater than medium is judged to be appropriate with reference to Table 1.11 of the ES Appendix 29.1 Seascape and Landscape Visual Impact Assessment and Visualisation Methodology [APP-170]. The assessment acknowledges that scale differences between offshore schemes will be apparent.</p> <p>These findings correspond with the findings of the viewpoint assessment (see <b>Table 2</b>) which also recognises that at these distances the project will only be visible in conditions of 'excellent atmospheric visibility'.</p> <p>The assessment here is in relation to sequential effects experienced by recreational users of the Suffolk Coastal Path (who are defined as being of generally high sensitivity). The assessment is not about effects on the special qualities of the SECHNL, or the SHC, which are considered further in <b>Section 3</b>.</p>

### 3 Assessment of Effects on the Special Qualities of the SECHNL and Special Character of the SHC

#### 3.1 Methodology for Assessing Effects on Special Qualities

14. ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] was carried out in accordance with the method provided in ES Appendix 29.1 Seascape and Landscape Visual Impact Assessment and Visualisation Methodology [APP-170]. This does not include a specific approach to the assessment of effects on special qualities of designated landscapes. For the assessment of effects on the SECHNL, presented in Table 29.21 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043], the following approach was taken:
- The special qualities of the SECHNL were reviewed individually and together;
  - The sensitivity of the SECHNL as a whole was considered with reference to the susceptibility of the different landscape types within it, and the national value placed on the designation;
  - The magnitude of impact on the SECHNL was evaluated in terms of the theoretical visibility of the North Falls offshore wind farm, and the ways in which views of the offshore wind farm could affect special qualities;
  - Consideration of magnitude included reference to the existing influence of development on the SECHNL, as recognised in two of the special qualities;
  - The assessment noted that the North Falls offshore wind farm “could further alter aspects of certain perceptual special qualities, where the relationship with the sea is more strongly expressed”, and illustrated this with quotes from nine of the special qualities; The scale of change on these special qualities was judged to be medium, and it was noted that other special qualities, not identified, would experience no change;
  - The geographical extent of the impact was judged to be small in relation to the extent of the SECHNL;
  - The magnitude of impact to the special qualities was judged to be “*locally low along the coast, and negligible further inland*”, resulting in moderate-minor (not significant) effects; and
  - Since effects were not significant, no examination was undertaken of effects on ‘natural beauty’ or the purposes of the designation.

#### 3.2 The Special Qualities and Natural Beauty of the SECHNL

15. As noted in Table 29.21 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043], the special qualities of the SECHNL are listed

in the Natural Beauty and Special Qualities Indicators document<sup>1</sup>. This was developed by LDA Design in 2016 on behalf of EDF Energy, and in consultation and agreement with the Suffolk Coast and Heaths AONB Partnership, Suffolk Coastal District Council and Suffolk County Council.

16. The 'special qualities' that are listed in Table 29.21 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [**APP-043**] are drawn from Section 2 of the document, headed 'Natural Beauty Indicators'. The assessment focuses on these 'natural beauty indicators' as the primary purpose of the SECHNL designation is to conserve and enhance the natural beauty of the area<sup>2</sup>. The 'indicators' are each related to one of the 'Factors related to Natural Beauty' defined by NE in their Guidance for assessing landscapes for designation<sup>3</sup>. These are:
- Landscape quality;
  - Scenic quality;
  - Relative wildness;
  - Relative tranquillity;
  - Natural heritage features; and
  - Cultural heritage.
17. The '*special qualities*' listed in Table 29.21 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [**APP-043**] represent a selection of relevant 'natural beauty indicators' listed in Section 2 of the Natural Beauty and Special Qualities Indicators document. Not every indicator has the potential to be affected by the type of development proposed. For example, indicators relating to habitats and species, or characteristic building materials, do not need to be considered in this assessment.
18. In reconsidering effects on the special qualities of the SECHNL, the natural beauty factors associated with each selected special quality have been noted. This enables an understanding of the way in which the special qualities interact to contribute to natural beauty and enables a clearer understanding of the effect that the project may have on the natural beauty of the SECHNL.

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<sup>1</sup> LDA Design (2016) Natural Beauty and Special Qualities of the Suffolk Coast and Heaths AONB. Available at [<https://coastandheaths-nl.org.uk/wp-content/uploads/2021/01/Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heaths-2016.pdf>]

<sup>2</sup> As set out in Section 82 of the Countryside and Rights of Way Act 2000.

<sup>3</sup> Natural England (2011) Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England. Available at [[https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb/supporting\\_documents/Guidance%20for%20assessing%20landscapes%20for%20designation%20as%20National%20Park%20or%20AONB%20in%20England.pdf](https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb/supporting_documents/Guidance%20for%20assessing%20landscapes%20for%20designation%20as%20National%20Park%20or%20AONB%20in%20England.pdf)]

### 3.3 Effects on the Special Qualities of the SECHNL

19. To more clearly set out the effects on special qualities of the SECHNL, Table 4 presents detailed commentary on the scope for effects on each of the selected special qualities of the SECHNL. The selected special qualities are grouped according to the natural beauty factors they are associated with. None of the selected special qualities are associated with 'relative tranquillity' or 'natural heritage features'.
20. The elements of the selected special qualities that were highlighted by quotation in ES Chapter 29 Seascape and Landscape Visual Impact Assessment [**APP-043**] are indicated in bold text in Table 4.

**Table 4 Potential Effects on Each of the Selected Special Qualities of the SECHNL**

Selected Special Quality	Potential effects
<b>Landscape Quality</b>	
<i>Close-knit interrelationship of semi-natural and cultural landscapes (notably sea, coast, estuaries, reedbeds, Sandlings heath, forest, farmland and market towns) and built heritage features (such as Martello towers, pill boxes, river walls), creating a juxtaposition of elements in a relatively small area.</i>	Limited potential for indirect effects on the 'juxtaposition of elements' within the SECHNL. The relationship between the different landscapes and built heritage features within the SECHNL will not be notably altered by views of a further offshore wind farm outside of the SECHNL. Offshore wind farms are a component of views from the coastal edge of the SECHNL, and the project is unlikely to unbalance or further detract from these juxtapositions. There will be no change to this special quality.
<i>A small number of large scale and long established elements on the coast of the AONB divide opinion, being regarded by some as incongruous features and by others as enigmatic; for example the complex military site at Orford Ness. The power stations at Sizewell also divide opinion in this way, however in many views, particularly of the B station, the apparent uncluttered simple appearance and outline as well as the lack of visible human activity, partially mitigate the adverse visual impacts.</i>	This special quality highlights the influence of existing large scale features, within the SECHNL, noting their ability to divide opinion. The project will introduce a further large scale element off the coast that may be viewed in a similar way. There will be no change to this special quality.
<i>Offshore wind turbines at Greater Gabbard, Galloper and the more distant London Array are visible from some stretches of the coastline. These create a cluttered horizon and, like the large scale elements onshore, also divide opinion.</i>	This special quality highlights the influence of existing wind farms in outward views from the SECHNL. The project will add to this, potentially increasing the perception of 'clutter' for some, but does not represent a new factor in the outlook. The scale of change to this special quality will be small.
<b>Scenic Quality</b>	
<i>Unique character defined by semi-natural and cultural landscapes (notably sea, coast, estuaries, reedbeds, Sandlings heath, forest, farmland and villages) and built heritage features (such as Martello towers, pill boxes, river walls), creating a juxtaposition of elements in a relatively small area.</i>	The interrelationship between the different landscapes and built heritage features within the SECHNL will not be notably altered by views of a further offshore wind farm outside of the SECHNL. Offshore wind farms are a component of views from the coastal edge of the SECHNL, and the project is unlikely to unbalance or further detract from these juxtapositions. There will be no change to this special quality.

Selected Special Quality	Potential effects
<i>Extensive shingle beaches and shallow bays provide opportunities for <b>long distance and panoramic views including out to sea</b> and along the Heritage Coast. Views to coastal landform also possible from locations offshore.</i>	<p>Potential to alter perceptual qualities associated with 'long distance and panoramic views including out to sea...' Offshore wind farms have altered these views and the proposed development will be seen in this cumulative context. Figure 29.1.9a of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-077] highlights the widespread visibility of existing offshore wind farms along the coastal edge and the limited nature of additional visibility introduced by the project.</p> <p>The viewpoint assessment identifies a magnitude of impact no greater than medium from coastal viewpoints, and this will reduce with distance from the Offshore Above-sea Development.</p> <p>The scale of change to this special quality will be medium.</p>
<i>Elevated vantage points provide impressive views over low lying coastal marshes, estuaries, beaches and <b>expansive long distance views out to sea</b>. Views to the coastline from out at sea are also noted.</i>	<p>Potential to alter perceptual qualities associated with 'expansive long distance views out to sea...' See above commentary in relation to coastal views. Elevated vantage points include the tower of Orford Castle (Viewpoint 7).</p> <p>The scale of change to this special quality will be medium.</p>
<i>Strong aesthetic, spatial and emotional experiences - for example in the contrast between <b>open and exposed areas on the coast</b>, seaward or within estuaries with more traditional enclosed farmland areas.</i>	<p>Offshore wind farms already influence the experience of openness and exposure, and the project will be seen in this context. The contrast between coastal areas and more enclosed landscapes is unlikely to notably change due to further views of offshore wind farms from coastal parts of the SECHNL.</p> <p>The scale of change to this special quality will be small.</p>
<i><b>Large open vistas</b> across heaths and <b>along the coast, out to sea and from sea to the coastline</b>. Landmarks include historic structures such as medieval churches, Martello towers and lighthouses, the House in the Clouds (Thorpeness) and Snape Maltings, the riverside at Woodbridge with iconic Tide Mill, along with more modern structures including Sizewell A and B and former military site at Orford Ness.</i>	<p>Potential to alter perceptual qualities associated with 'large open vistas across heaths and along the coast, out to sea and from sea to the coastline...' See above commentary in relation to coastal views. Views of the project are unlikely to conflict with views of the noted landmarks.</p> <p>The scale of change to this special quality will be small.</p>
<i>Sensory stimuli enhanced by <b>quality of light/space (the big 'Suffolk skies')</b>, areas with dark skies and sound (e.g. bird calls, curlews on heath and geese on estuaries, the wind through reeds in estuaries, waves on shingle).</i>	<p>Potential to alter perceptual qualities associated with the big 'Suffolk skies'. The project will not alter natural properties of light across the area, nor will it impact on sounds. There will be no effects on dark skies as a result of aviation lighting on the turbines.</p> <p>The scale of change to this special quality will be small.</p>
<b>Relative Wildness</b>	
<i>Absence of major coastal road or rail route, due to estuaries, and intermittent 'soft edged', often lightly trafficked access routes across the AONB to the coastline from main routes inland, has contributed to the <b>relatively undeveloped character of the Suffolk coast</b>.</i>	<p>Potential to alter perceptual qualities associated with the 'relatively undeveloped' Suffolk coast. The project will not alter the 'soft edged' nature of the coast.</p> <p>The scale of change to this special quality will be small.</p>
<i><b>Pockets of relative wildness associated with coast, estuary and forests</b> in this largely farmed and settled landscape.</i>	<p>Potential to alter perceptual qualities associated with the 'relative wildness' at the coast. There are existing offshore wind farms that alter 'relative wildness', and the project will intensify this existing effect. It is likely that the</p>

Selected Special Quality	Potential effects
	coast will continue to be experienced as relatively wild in comparison to other parts of the SECHNL landscape. The scale of change to this special quality will be small.
<b><i>Largely undeveloped coastline and offshore areas and areas of semi-natural habitat including Sandlings heath, forests, reedbeds, estuaries and marshland.</i></b>	Potential to alter perceptual qualities associated with the largely undeveloped offshore areas. While there are currently remaining undeveloped areas off the coast of the SECHNL, the project will be located close to other offshore development. There will be a further reduction in undeveloped offshore views, and cumulatively the project will contribute somewhat to 'curtaining', though it will occupy a modest extent of the skyline. The scale of change to this special quality will be medium.
<i>A small number of large scale and industrial elements on the coast of the AONB are long established, notably Sizewell A and B and the former military site at Orford Ness, whilst offshore wind turbines at Greater Gabbard, Galloper and the more distant London Array are visible from stretches of the coastline.</i>	This special quality highlights the influence of existing large scale features in the SECHNL, and offshore wind farms in outward views from the SECHNL. The project will introduce a further large scale element off the coast that will be viewed cumulatively with the existing developments. There will be no change to this special quality.
<b><i>Big 'Suffolk skies' and expansive views offshore emphasise sense of openness and exposure on open and exposed coastline and on the Sandlings heaths.</i></b>	Potential to alter perceptual qualities associated with the 'Suffolk skies' and expansive offshore views. The project will be seen on distant skylines, and will alter the simple sea based horizon. These effects will be focused to a small part of the horizon and seen in the context of other offshore wind farms which have altered sea based horizons. The overall experience of 'big skies' – which are experienced by looking up and along wide horizons – is unlikely to notably change. The scale of change to this special quality will be small.
<i>Significant areas of semi natural landscape and seascape notably along the coastline, offshore and within undeveloped estuaries where there is little evidence of apparent human activity despite the sea walls and coastal marshes.</i>	Potential to alter perceptual qualities that arise from the lack of evidence of human activity. While there are currently remaining semi natural seascapes off the coast of the SECHNL, the project will be located close to other offshore development. There may be a further increase in 'apparent human activity', though this is distant. The scale of change to this special quality will be small.
<b>Cultural Heritage</b>	
<i>More latterly the Sizewell nuclear complex highlights evidence of time depth across the landscape. Both the nuclear complex and the nearby infrastructure associated with offshore energy generation are part of a developing story of the Suffolk's Energy Coast.</i>	This special quality highlights the influence of existing large scale features in the SECHNL, and offshore wind farms in outward views from the SECHNL. The project will contribute to the "developing story of the Suffolk's Energy Coast". There will be no change to this special quality.
<i>There are often strong associations between these [historic] features and areas of more remote coastal landscape character.</i>	This special quality highlights the relationship between heritage features of various periods and the remote coast. The project is unlikely to unbalance these relationships. There will be no change to this special quality.

21. The assessments of scale of change set out in Table 4 can be summarised for each of the natural beauty factors as follows:

- Landscape quality: small or no change to the selected special qualities.

- Scenic quality: medium for two selected special qualities, small or no change for others.
  - Relative wildness: medium for one selected special quality, small or no change for others.
  - Relative tranquillity: no change (no special qualities selected).
  - Natural heritage features: no change (no special qualities selected).
  - Cultural heritage: no change to the selected special qualities.
22. As noted in ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] “the scale of change on certain perceptual aspects of the SECHNL special qualities is judged to be medium, although other special qualities will be entirely unchanged.” The above assessment clarifies which special qualities will be affected in this way.
23. The magnitude of change to these special qualities will be low. It is concluded that the project will give rise to moderate-minor (not significant) effects on three of the selected special qualities. By extension, the project will give rise to moderate-minor (not significant) effects on the Scenic Quality and Relative Wildness aspects of the natural beauty of the SECHNL.

### 3.4 Effects on the Special Character of the SHC

24. NE state that effects on the special character of the SHC have not been assessed within ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043]. The Applicant’s position is that effects on the special character of the SHC are taken into account as a sub-set of effects on the SECHNL, and these are set out in Table 29.21 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043].
25. The SHC is located wholly within the SECHNL (refer to Figure 1 and Figures 2a, 2b and 2c).
26. NE draw attention to the purpose of Heritage coasts, which were established to:
- *“conserve, protect and enhance:*
    - *the natural beauty of the coastline;*
    - *their terrestrial, coastal and marine flora and fauna;*
    - *their heritage features;*
  - *encourage and help the public to enjoy, understand and appreciate these areas;*
  - *maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures;*

- *take account of the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts.*<sup>4</sup>
27. In the context of SLVIA, understanding the potential for effects on the ‘natural beauty of the coastline’ is therefore key to the assessment of effects on their special character.
  28. NE confirm in Appendix I2 to the Relevant Representations of Natural England Seascape, Landscape and Visual Impact Assessment [REP1-071] that the special character of the SHC can be understood with reference to landscape character assessments, and the natural beauty of the SECHNL.
  29. The landscape character types (LCTs) defined in the Suffolk Landscape Character Assessment are discussed in ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043], and the effects of the project on these landscapes are assessed.
  30. Table 5 highlights the LCTs which fall inside the SHC, and which have been considered in detail in ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043]. There are small areas of other LCTs within the SHC, as shown on Figures 2a, 2b and 2c, that were not considered in detail in the SLVIA. These are inland LCTs where the relationship with the sea does not have a strong influence on character (as recognised in the key characteristics), and/or are distant from the Array Area (over 50km).
  31. For each LCT the key characteristics (as defined in the Suffolk Landscape Character Assessment) are listed. Those key characteristics with the potential to be subject to perceptual effects arising from the project are highlighted in bold. Commentary notes the relationship of the key characteristics with the special qualities and natural beauty of the SECHNL. The effects on landscape character identified in the SLVIA are also noted in each case.

**Table 5 Key Landscape Characteristics for LCT's in the SHC**

Landscape Character Type	Key Characteristics (highlighted in bold) with potential to be subject to indirect effects (including cumulative) associated with the proposed offshore wind farm	Commentary on potential effects
Coastal dunes and shingle ridges (LCT5)	<ul style="list-style-type: none"> <li>• Flat or gently rolling landform of sand or shingle</li> <li>• Low fragile vegetation</li> <li>• <b>Vast open uncluttered landscape</b></li> <li>• Historic military structures</li> <li>• <b>Occasional large buildings in an empty landscape</b></li> </ul>	<p>Key characteristics highlight the vast, uncluttered and empty nature of the landscape, which are also noted in the SECHNL special qualities related to Scenic Quality. They highlight the occasional large buildings and military structures identified in other SECHNL special qualities.</p> <p>See Table 29.16 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] for the full assessment of effects on this LCT. Effects were found to be</p>

<sup>4</sup> Natural England (2015) Heritage coasts: definition, purpose and Natural England's role. Available at [<https://www.gov.uk/government/publications/heritage-coasts-protecting-undeveloped-coast/heritage-coasts-definition-purpose-and-natural-englands-role#purpose-of-heritage-coasts>]

Landscape Character Type	Key Characteristics (highlighted in bold) with potential to be subject to indirect effects (including cumulative) associated with the proposed offshore wind farm	Commentary on potential effects
	<ul style="list-style-type: none"> <li>Occasional fishing huts and boats on the beach</li> <li>Only in short stretches is there the paraphernalia of intensive tourist activity, beach huts and piers</li> </ul>	moderate-minor (not significant) within the SHC, along the narrow coastal edge between the River Deben and Orford Ness.
Coastal levels (LCT6)	<ul style="list-style-type: none"> <li>Flat marshland adjacent to the coast or estuaries</li> <li>Marine alluvium soils</li> <li>Sinuuous and complex mediaeval dyke networks</li> <li>Uniform 19th century dyke networks</li> <li>Cattle-grazed wet grassland</li> <li>Widespread modification for arable production</li> <li>Small plantations and carr woodlands</li> <li>Inland side of rising ground often wooded</li> <li>Important wildlife conservation areas</li> <li><b>Unsettled landscape</b> with domestic buildings on the fringes</li> <li>Derelict wind pumps</li> </ul>	<p>Key characteristics note the unsettled nature of the landscape. Although not noted in key characteristics, the character description discusses the visual experience of the landscape:</p> <p><i>"The views are generally open and wide, and there is usually a profound sense of exposure, enhanced when the sea or a wide estuary is close at hand. On the inland side the rising land, and the trees on it, tend to confine the views."</i></p> <p>These observations can be correlated with the special qualities of the SECHNL that relate to Scenic Quality and Relative Wildness.</p> <p>See Table 29.17 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] for the full assessment from this LCT. Effects were found to be moderate-minor (not significant) within the SHC, along coastal sections of the River Ore and River Alde.</p>
Rolling estate sandlands (LCT16)	<ul style="list-style-type: none"> <li>Rolling river terraces and coastal slopes</li> <li>Sandy and free draining soils with areas of heathland</li> <li>Late enclosure with a pattern of tree belts and straight hedges</li> <li>Landscape parklands</li> <li>A focus of settlement in the Estate Sandlands landscape</li> <li>19thC red brick buildings with black glazed pantiles in the east</li> <li>Lark valley buildings are frequently of brick or flint with tiled or slate roofs</li> <li>Tree belts and plantations throughout</li> <li>Occasional and significant semi-natural woodlands and ribbons of wet woodland</li> <li>Complex and intimate landscape on valley sides</li> </ul>	<p>As noted in Table 29.18 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043], the key characteristics of this LCT mention no specific relationship with the sea, and marine views are not mentioned in the LCT description.</p> <p>The characteristics of this LCT therefore contribute less to the special character of the SHC.</p> <p>See Table 29.18 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] for the full assessment from this LCT. Effects were found to be moderate-minor (not significant) within the SHC, between Bawdsey and the River Deben.</p>
Saltmarsh and intertidal flats (LCT20)	<ul style="list-style-type: none"> <li>Marine alluvium and some outcrops of clay, forming mud flats</li> </ul>	Key characteristics highlight the wild nature and sense of isolation experienced from this landscape. These are closely linked to the special qualities of the SECHNL which

Landscape Character Type	Key Characteristics (highlighted in bold) with potential to be subject to indirect effects (including cumulative) associated with the proposed offshore wind farm	Commentary on potential effects
	<ul style="list-style-type: none"> <li>• Inter-tidal flats dissected by creeks</li> <li>• A few small areas of saltmarsh</li> <li>• <b>Wild unimproved land</b></li> <li>• <b>Unsettled landscape</b></li> <li>• <b>Powerful sense of isolation and wildness</b></li> <li>• Integral to the setting of notable features</li> <li>• Suffering from coastal squeeze and the associated erosion</li> </ul>	<p>contribute to Scenic Quality and Relative Wildness.</p> <p>See Table 29.19 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] for the full assessment from this LCT. Effects were found to be moderate-minor (not significant) within the SHC, in small areas at Orford Ness and the River Deben.</p>

32. Table 5 highlights that the perceptual aspects of key landscape characteristics that may be affected by the project, are also those that contribute to the SECHNL special qualities noted under Table 4, particularly those relating to Scenic Quality and Relative Wildness. A clear relationship can be drawn between the characteristics of the landscape, the special qualities of the SECHNL, and the special character of the SHC.
33. The effects of the project on LCTs were found to be moderate-minor (not significant) along sections of coastal landscape within the SHC. Effects on the Scenic Quality and Relative Wildness aspects of the natural beauty of the SECHNL were also found to be moderate-minor (not significant). On the basis that the special character of the SHC derives from the key characteristics of LCTs, and the natural beauty of the SECHNL, it is concluded that effects on the special character of the SHC would also be moderate-minor (not significant).

### 3.5 Cumulative Effects

34. Cumulative effects on the special qualities of the SECHNL and the special character of the SHC will arise from the combination of the project with other existing and proposed offshore wind farms. Table 29.39 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] summarises the cumulative effects of the project. Effects on coastal LCTs and the SECHNL will be moderate-minor (not significant). Cumulative effects on views will be moderate (significant) at Viewpoint 8 Orford Ness, 9 Shingle Street and 10 Pulhamite Cliffs, but will not be significant from other viewpoints within the SECHNL or SHC. At these viewpoints, the project will contribute somewhat to 'curtaining' of the skyline, although it occupies a modest extent of the skyline (approximately 15 degrees as viewed from the north) and will appear low on the horizon.
35. Paragraph 157 of ES Chapter 29 Seascape and Landscape Visual Impact Assessment [APP-043] states, in relation to total cumulative effects, that there is potential for these to be significant in relation to LCTs 5, 6 and 20 along the

Suffolk coast between Felixstowe and Orford Ness, which are within the SECHNL and SHC. By extension, total cumulative effects on the special qualities of the SECHNL and the special character of the SHC may be significant. However, the contribution of the North Falls project will be limited due to the relatively modest horizontal extent of the wind turbines, when viewed from the north.

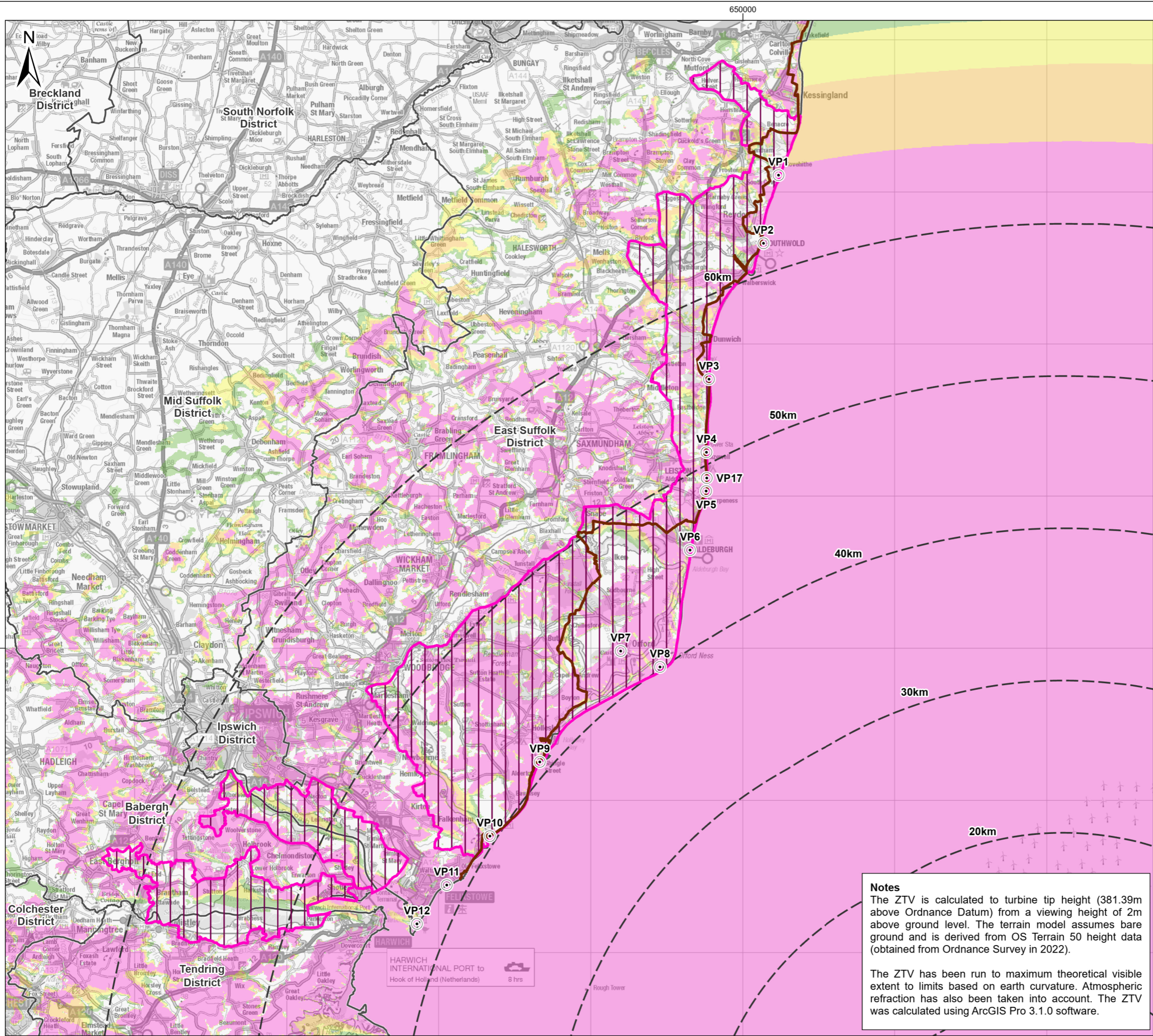
## 4 Summary

36. This technical note has collated and reviewed the effects on landscape and visual receptors within the SECHNL and SHC and confirmed that the assessments presented in the SLVIA [APP-043] are robust and appropriate in each case. Significant effects were identified for three assessment viewpoints and the users of the Suffolk Coast Path, representing higher sensitivity receptors at coastal locations along the south-facing section of the SECHNL and SHC. No significant effects were identified for any landscape receptors.
37. The technical note has reviewed the potential for effects on the special qualities of the SECHNL. The methodology for assessment has been explained, the effects set out in detail for the individual special qualities, and the findings have been described in relation to the natural beauty criteria.
38. The project will be located in the offshore waters approximately 40km to the south-east of the SECHNL and SHC. Impacts on the SECHNL will be as a result of changes to aspects of certain perceptual qualities. Table 4 of this technical note highlights the special qualities likely to be subject to indirect effects.
39. Actual visibility from the SECHNL is generally limited to the open coastal edge. When visible, the project will typically be seen in the context of large scale coastal views, with expansive areas of sea and sky. The project will not affect the immediate setting of the SECHNL, but will be seen on and beyond the horizon in sea based views.
40. On clear days, operational wind farms including East Anglia One, Greater Gabbard, Galloper and London Array are visible in seaward views from the SECHNL. This is recognised at a number of places in the special qualities, as highlighted in Table 4. The project will introduce further wind turbines into the distant seascape setting of the coastal edge of the SECHNL, intensifying an existing effect but not introducing a wholly new feature into views.
41. It is judged that the scale of change on three of the selected special qualities will be medium, with small or no change to the others. The assessment concludes that the project will give rise to moderate-minor (not significant) effects on three of the selected special qualities. By extension, the project will give rise to moderate-minor (not significant) effects on the Scenic Quality and Relative Wildness aspects of the natural beauty of the SECHNL.
42. The special character of the SHC has been considered in relation to landscape character and natural beauty. Table 5 analyses the key characteristics described in the Suffolk Landscape Character Assessment, and shows how they are closely related to the special qualities of the SECHNL. On the basis that the special character of the SHC derives from the key characteristics of

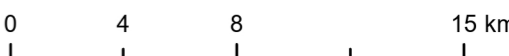
LCTs, and the natural beauty of the SECHNL, it is concluded that effects on the special character of the SHC would also be moderate-minor (not significant).

43. The 'total' cumulative effects of all operational and proposed development on the special qualities of the SECHNL and the special character of the SHC may be significant. However, the contribution of the North Falls project to this total effect will be limited due to the relatively modest horizontal extent of the wind turbines, when viewed from the north.

## Figures



- Legend**
- Suffolk and Essex Coast and Heaths National Landscape
  - Turbine buffers - 10km intervals
  - Local Authority Boundary
  - Suffolk Coastal Path
- Bareground ZTV to Tip (381.39m)**
- 1 - 10 Turbines Visible
  - 11 - 20 Turbines Visible
  - 21 - 30 Turbines Visible
  - 31 - 34 Turbines Visible
- Viewpoint**
- 1: Covehithe
  - 2: Southwold Pier
  - 3: Dunwich Coastguard Cottages
  - 4: Sizewell Beach
  - 5: Cliffs above Thorpeness
  - 6: Aldeburgh
  - 7: Orford Castle
  - 8: Orford Ness
  - 9: Shingle Street
  - 10: Pulhamite Cliffs (Bawdsey Manor)
  - 11: Felixstowe Seafront Gardens
  - 12: Landguard Fort
  - 17: Coastal Path between Thorpeness and Sizewell (wireline only)



Data Source: OS, LUC, RHDHV

**Suffolk and Essex Coast and Heaths National Landscape Context**

Rev	Date	Remarks	Drwn	Chkd
01	26/02/2025	First issue	JB	RW

Drawing Number	Figure Number
<b>Figure 1</b>	<b>1</b>

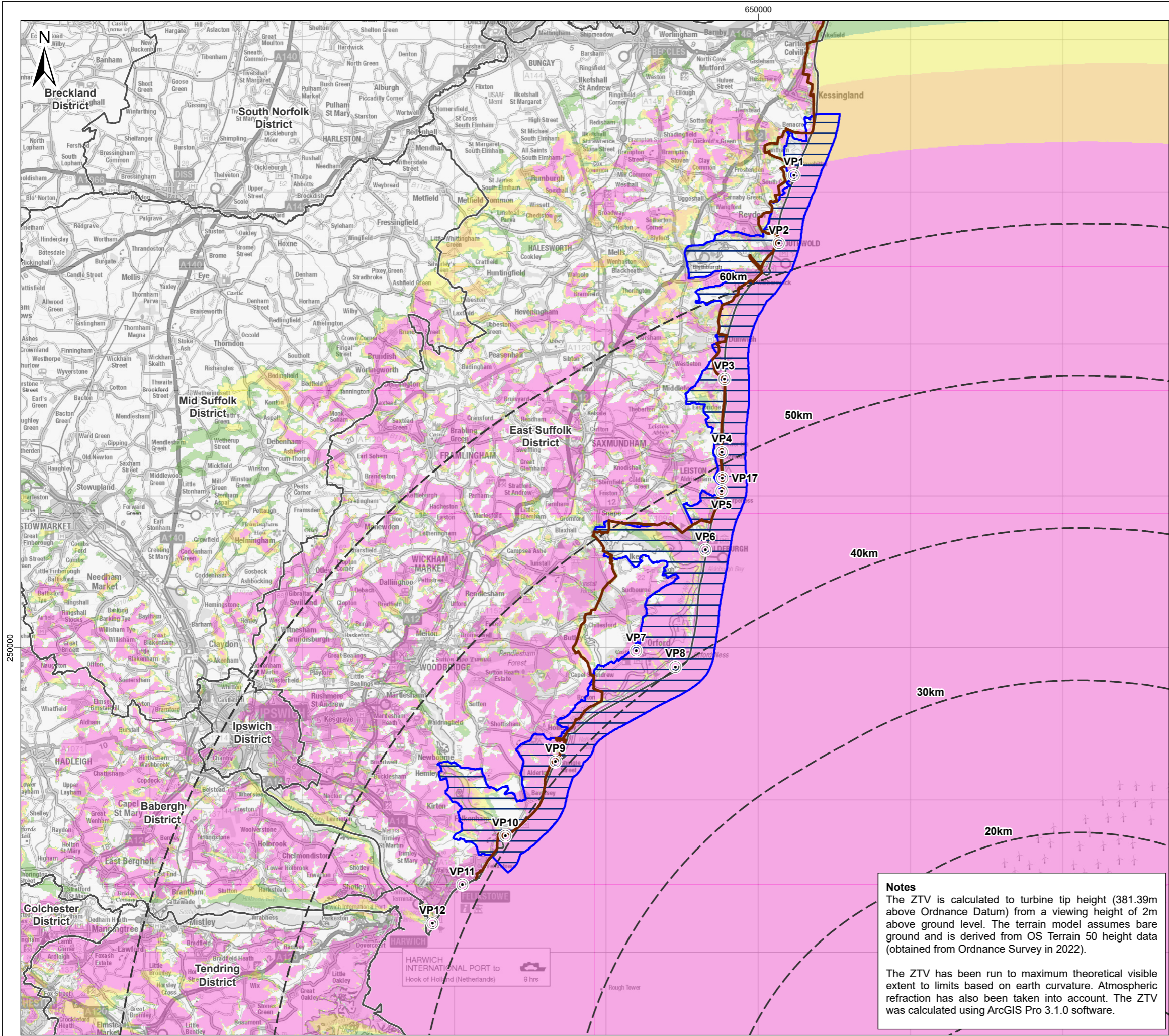
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**Notes**

The ZTV is calculated to turbine tip height (381.39m above Ordnance Datum) from a viewing height of 2m above ground level. The terrain model assumes bare ground and is derived from OS Terrain 50 height data (obtained from Ordnance Survey in 2022).

The ZTV has been run to maximum theoretical visible extent to limits based on earth curvature. Atmospheric refraction has also been taken into account. The ZTV was calculated using ArcGIS Pro 3.1.0 software.



**Legend**

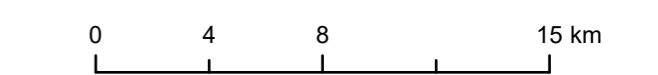
- Suffolk Heritage Coast
- Turbine buffers - 10km intervals
- Local Authority Boundary
- Suffolk Coastal Path

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

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

**Viewpoint**

- 1: Covehithe
- 2: Southwold Pier
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- 4: Sizewell Beach
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Data Source: OS, LUC, RHDHV

Drawing Title

### Suffolk Heritage Coast Landscape Context

Rev	Date	Remarks	Drwn	Chkd
01	26/02/2025	First issue	JB	RW

Drawing Number

Figure Number

**Figure 2 a**

Scale

Plot Size

Datum

Projection

1:250,000

A3

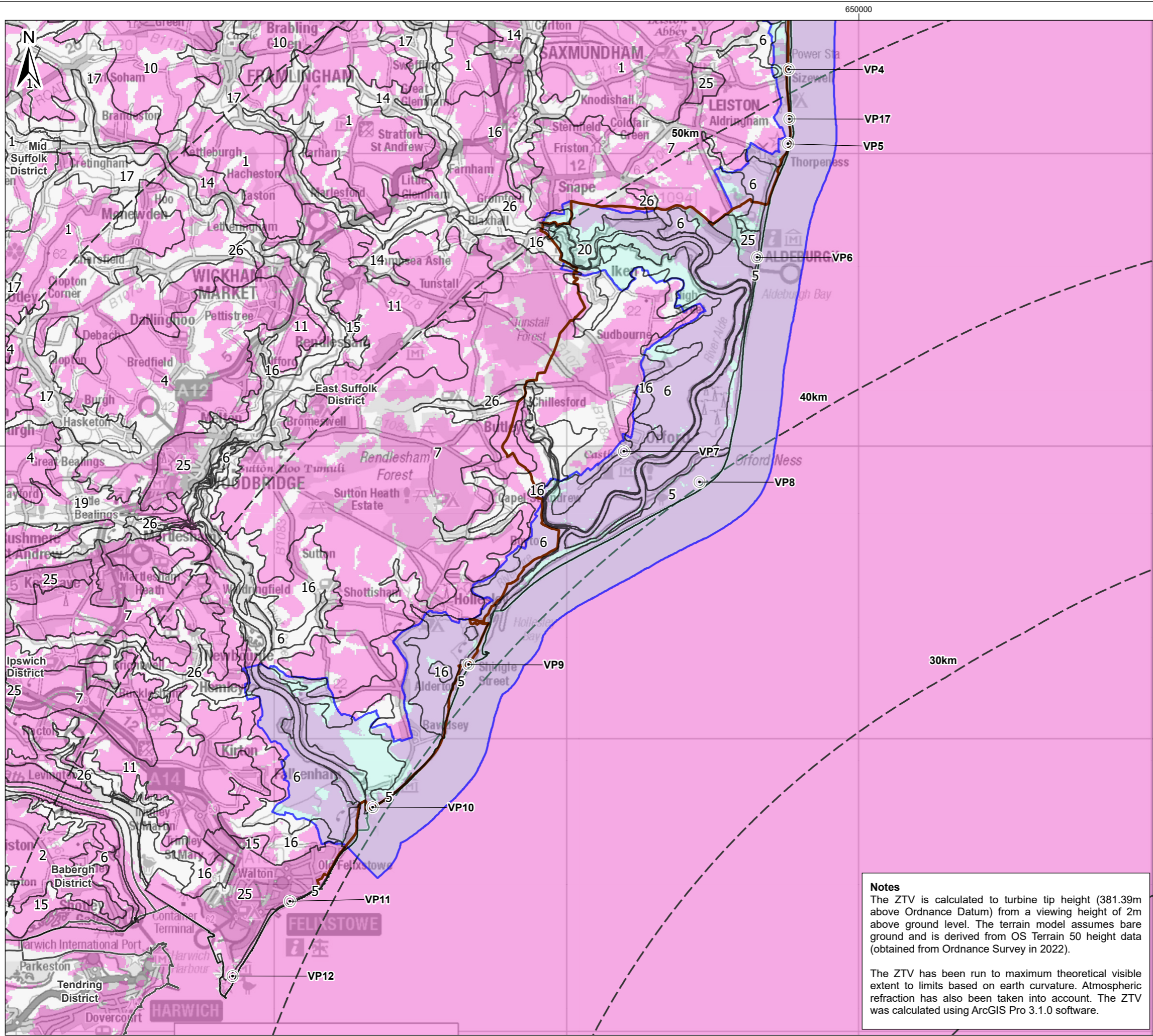
OSGB36

BNG

**LUC**

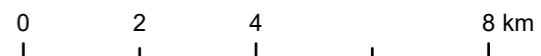


**NORTH FALLS**  
Offshore Wind Farm



**Legend**

- Suffolk Heritage Coast
- Turbine buffers - 10km intervals
- Local Authority Boundary
- Suffolk Coastal Path
- Turbines visible
- Viewpoint**
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  - 17: Coastal Path between Thorpeness and Sizewell (wireline only)
- Suffolk Landscape Character Types within Heritage Coast designation**
  - 5. Coastal Dunes and Shingle Ridges
  - 6. Coastal Levels
  - 7. Estate Sandlands
  - 8. Open Coastal Fens
  - 16. Rolling Estate Sandlands
  - 19. Rolling Valley Farmlands and Furze
  - 20. Saltmarsh and Intertidal Flats
  - 25. Urban
  - 26. Valley Meadowlands
  - 27. Valley Meadows and Fens
  - 29. Wooded Fens



Data Source: OS, LUC, RHDHV

**Suffolk Heritage Coast Landscape Context including Landscape Character Types**

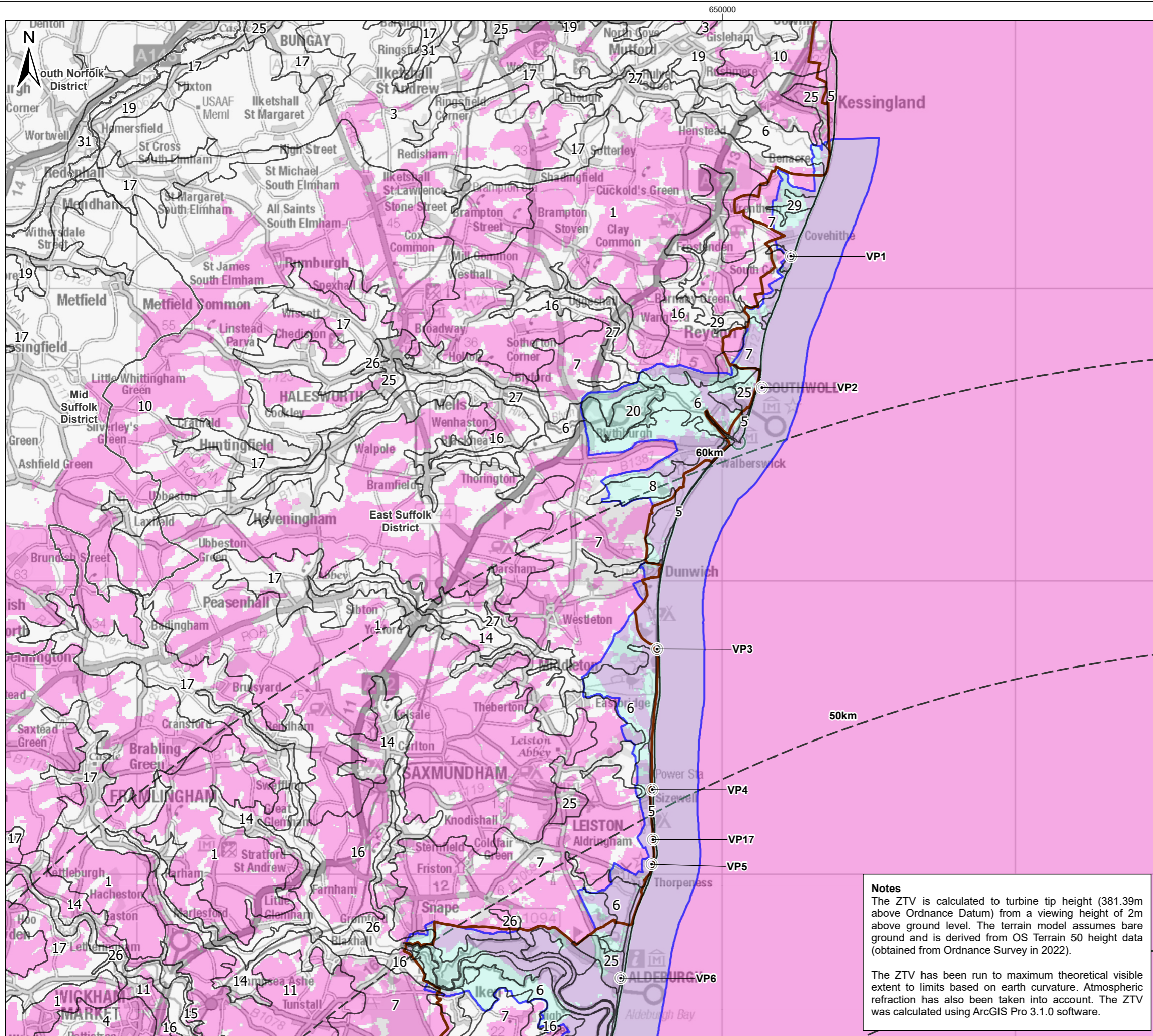
Rev	Date	Remarks	Drwn	Chkd
01	26/02/2025	First issue	JB	RW

Drawing Number **Figure 2 b** Figure Number **2 b**

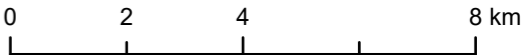
Scale 1:130,000	Plot Size A3	Datum OSGB36	Projection BNG
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**Notes**  
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Data Source: OS, LUC, RHDHV

Drawing Title

### Suffolk Heritage Coast Landscape Context including Landscape Character Types

Rev	Date	Remarks	Drwn	Chkd
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Drawing Number

Figure 2 c

Figure Number

2 c

Scale	Plot Size	Datum	Projection
1:130,000	A3	OSGB36	BNG



NORTH FALLS  
Offshore Wind Farm

**Notes**

The ZTV is calculated to turbine tip height (381.39m above Ordnance Datum) from a viewing height of 2m above ground level. The terrain model assumes bare ground and is derived from OS Terrain 50 height data (obtained from Ordnance Survey in 2022).

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**NORTH FALLS**

*Offshore Wind Farm*



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

*North Falls Offshore Wind Farm Limited*

*A joint venture company owned equally by SSE Renewables and RWE.*

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