

North Falls Offshore Wind Farm Ltd for North Falls Offshore Wind Farm. The Examining Authority's written questions and requests for information (ExQ3) Issued on 1 July 2025



Response from Suffolk & Essex Coast & Heaths National Landscape 20050780. Note this is a response from the National Landscape Manager as there insufficient time to develop the response with the full Suffolk & Essex Coast & Heaths National Landscape Partnership.

Ref	Question to	Question	National Landscape Manager response (on behalf of the Suffolk & Essex Coast & Heaths National Landscape)
Q12.0.2	Applicant. IPs	NPS EN-5, para 2.2.10 requires that public benefits should outweigh harm to heritage assets. Please can the Applicant elaborate on the public benefits which it considers will outweigh any harm. IPs are invited to comment.	The Suffolk & Essex Coast & Heaths National Landscape consider the nationally designated Area of Outstanding Natural Beauty (branded as a National Landscape) to be a heritage asset
Q14.0.4	Applicant, SCC, other IPs	<p>Duty to Enhance National Landscape.</p> <p>The Applicant's response to ExQ2 Q14.0.1 confirmed that the Applicant is a statutory undertaker as defined in s85 of the CRoW Act, and that it is therefore a relevant authority for the purposes of the Act. The Applicant set out its position within its Position Statement [REP5-068], as well as [REP5-055] and in further information submitted at Deadline 6, in response the ExA's Rule 17 request dated June 6 2025 [PD-014].</p> <p>In summary, the response [REP6-062] considers, on a without prejudice basis, specific additional compensatory measures that could be applied to enable the Applicant and the Secretary of State to discharge the Duty should the Secretary of State consider that such measures are required, including consideration of principles to form the basis for the development and delivery of a National Landscape Enhancement Scheme (or similar) together with a list of</p>	The Suffolk & Essex Coast & Heaths National Landscape consider that as a statutory undertaker the applicant needs to demonstrate that it 'seeks to further the purpose of the Area of Outstanding Natural Beauty (branded as a National Landscape) in its decision making in relation to where those decisions impact the designated landscape. The document appears to be making (limited) compensatory proposals rather than seeking to conserve and enhance natural beauty. The proposed enhancement scheme appears to lack ambition, scope and magnitude consummate with impacts that may be experienced by the National Landscape. While recognising efforts to lessen the impact the Suffolk & Essex Coast & Heaths National Landscape draw the Examining Authorities attention to other NSIPs and how they have addressed the strengthened duty. Eg Second Thames Crossing, Norwich to Tilbury and prior to the strengthening of the duty Sizewell C and East Anglia One North and East Anglia Two.

		<p>projects identified and a mechanism for securing such a scheme [REP6-062].</p> <p>The Applicant considers that the effects on the SECHNL are visual in nature only. Environmental Statement (ES) Chapter 29 Seascape, Landscape and Visual Impact Assessment (SLVIA) [APP-043] concludes that there will be significant effects on views from locations along the southern coastal edge of the SECHNL, between the River Deben and Orford Ness. There will be no significant effects on landscape character, and no significant effects on the special qualities of the SECHNL [REP5-038].</p> <p>The ExA now seeks views from IPs on the response [REP6-062] including the without prejudice Requirement and the content of the National Landscape Enhancement Strategy.</p> <p>Further specific questions are also set out below.</p>	
Q14.0.5	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Mechanism for Delivery The ExA notes the Applicant's suggested wording for a Requirement to deliver the National Landscape Enhancement Scheme (below), submitted on a without prejudice basis at Deadline 6 [REP6-062]: National Landscape Enhancement Scheme (1) Work No. 1 and Work No. 2 must not be commenced until a National Landscape Enhancement Scheme has been submitted to and approved by the discharging authority in consultation with Suffolk & Essex Coast & Heaths National Landscape Partnership. (2) The National Landscape Enhancement Scheme must accord with the principles and fund size set out in the National Landscape Enhancement Scheme principles</p>	<p>It is welcomed that the Suffolk & Essex Coast & Heaths National Landscape is to be consulted on work no. 1 and work no.2 by the discharging authority. However, it notes that the Suffolk & Essex Coast & Heaths National Landscape staff team is small and the additional burden will require an assessment of priorities if not provided resources to undertake this work.</p>

		document. (3) The National Landscape Enhancement Scheme must be implemented as approved. (4) In this Requirement “the National Landscape Enhancement Scheme principles document” means the principles set out in Table 1 of Applicant’s Response to ExA’s Request for further information (Rule 17) - National Landscapes. Comments from IPs are specifically sought in relation on the wording of above suggested Requirement, submitted on a without prejudice basis.	
Q14.0.6	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Scope of Projects</p> <p>The scope of projects is set out in Table 1 of [REP6-062], with a focus on projects and initiatives relating to enjoyment of the coast and coastal views and those in line with the objectives of the Suffolk & Essex Coast & Heaths National Landscape Management Plan 2023-2028. Projects could include (but would not be limited to) enhancements to car parking, access or visitor facilities at coastal locations; footpath enhancements including to coastal paths; beach surveys and clean ups. These would be delivered as part of the National Landscape Enhancement Scheme will be selected at the discretion of the Suffolk & Essex Coast & Heaths National Landscape Partnership.</p> <p>The ExA requests IPs comments on the scope of projects.</p>	<p>The Suffolk & Essex Coast & Heaths National Landscape manager considers the scope of projects to be inappropriate. The statutory purpose of an Area of Outstanding Natural Beauty (branded as a National Landscape) is to conserve and enhance natural beauty. It does not consider the three bullet points (noting the suggestion is not limited to these) appropriate for delivering statutory purpose.</p> <p>It suggests that the scope of the project be reworded to say that say the scope is to deliver statutory Area of Outstanding Natural Beauty (National Landscape) purpose.</p>
Q14.0.7	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Spatial Scope</p> <p>The spatial scope of the projects is set out in Table 1 of [REP6-062], and focuses on the area likely to be affected by views of the Project, ie. the coastal edge between the River Deben and Orford Ness. Table 1 states that “All projects and initiatives must therefore be located within this area”. The ExA requests IPs comments on the spatial scope, and the</p>	<p>The Suffolk & Essex Coast & Heaths National Landscape consider the designated landscape as a single entity and that the spatial scope should include the whole of the National Landscape and its setting.</p>

		suggestion that initiatives must be within the area between the River Debden and Orford Ness.	
Q14.0.8	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Fund Size The fund size of £10,000 is set out in Table 1 of [REP6-062]. The ExA requests IPs comments on the Applicant's proposed fund size, and whether or not the measures and fund size can be considered to be proportionate to the type and scale of development as it affects the National Landscape, reasonably related to the identified residual adverse effects, and sufficient to allow for the discharge of the statutory duty by both the Applicant and by the Secretary of State.</p>	<p>The Suffolk & Essex Coast & Heaths National Landscape consider the proposed £10,000 fund size not consummate with the impacts experienced by the National Landscape and a fund at that magnitude would not be able to deliver the enhanced duty on relevant authorities expressed in section 245 of the Levelling Up and Regeneration Act (2000)/revised section 85 Countryside and Rights of Way Act (2000).</p> <p>It further considers that if the Suffolk & Essex Coast & Heaths National Landscape team is expected to support delivery of the fund it needs to be resourced to do so.</p>
Q14.0.9	IPs, Applicant	<p>National Landscape Enhancement Scheme Principles: Fund Timing The fund timing is set out in Table 1 of [REP6-062], which suggests a single one-off payment made by the Applicant to the Suffolk & Essex Coast & Heaths National Landscape Partnership prior to the commencement of construction of Work No. 1 or Work No. 2. The timing of projects and initiatives benefited by the fund would then be at the discretion of the Suffolk & Essex Coast & Heaths National Landscape Partnership. The ExA requests IPs comments on the fund timing.</p>	No comments
Q14.0.11	Applicant, Natural England, ECC, SCC, SECHNLP	<p>Impact on LCTs</p> <p>In response to ExQ2 14.0.5 the Applicant confirmed that in its view, at a distance of over 40km from any onshore LCT (Landscape Character Type), that it is satisfied that "the magnitude of change is correctly recorded as 'low'" in each case.</p> <p>i) Please can the Applicant confirm what, if any other criteria than distance have been used to estimate the magnitude of change.</p>	<p>The Suffolk & Essex Coast & Heaths National Landscape consider the need to the impacts of a setting sun on the visibility of the offshore array. In particular looking out of the National Landscape (the long views are a defined feature of the designated landscape) the sun may be setting from behind the viewer and there is potential for enhanced visibility of the offshore structures due to reflection of the sun on the built structures.</p>

		ii) ii) Please can NE (and others, optionally) comment on factors other than distance which they consider would contradict the Applicant's assertion regarding the 40km distance to any onshore LCT.	

Public Benefit NPS EN-5, para 2.2.10 requires that public benefits should outweigh harm to heritage assets. Please can the Applicant elaborate on the