



The North Falls Offshore Wind Farm project (EN010119)

Babergh District Council submission to procedural deadline 7

This is the submission of Babergh District Council to deadline 7 of the examination for the North Falls Offshore Wind Farm project (EN010119) consisting of Babergh District Councils' responses to ExQ3.

1. Babergh District Council responses to ExQ3

Q8.0.1.

Babergh District Council expects to be included in stakeholder collaboration and community engagement on design visions and suggests that the hybrid format of meetings would be appropriate.

Q8.0.4.

No comment

Q10.0.5.

No comment

Q12.0.2.

The secretary of state should be satisfied that the public benefits of the development outweigh heritage harm. The public benefits of the development are considered to be the contribution to the transition to a low carbon economy and the UK's legally binding net zero targets' objectives of the government's Clean Power 30 agenda.

Q12.0.3.

No comment

Q14.0.1.

The Council understands that the applicant has estimated that the woodland/shelterbelt planting will reach approximately 6-8m after 15 years. The Indicative Planting cross-sections at the onshore substation (Rev 2) [REP5-035) and the visualisations supplied with the ES demonstrate that the proposed planting never fully conceals the substation.



The Council is concerned that without appropriate scaled drawings being required to associate with the Final LEMP, the full intention of the proposed landscape strategy and its successful implementation at the delivery stage cannot be guaranteed and risks not being successfully delivered.

Q14.0.4.

Whilst the Council is not impacted in LVIA terms by the proposed offshore elements of the North Falls proposals we have concerns regarding how the approach to the 'Duty' is interpreted by the applicant.

- The project types focus closely on promotion of the National Landscape through access rather than directly 'contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes' as identified in government guidance <https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>. Projects should more closely help to deliver landscape restoration that in turn delivers visual benefits, rather than mainly physical access projects.
- The scope of the enhancement scheme should more closely align with the scale of the impact i.e. significant visual impacts over a 16km odd length of the coast (taken from the mouth of the Deben to Orford Ness). £10K appears a derisory sum in order to deliver appropriate enhancement.

Q14.0.5

Whilst Babergh District Council acknowledge the effort to address the statutory duty through he suggested requirement, the Council are concerned that this is insufficient to address the s.98 duty and does not address impacts on the Dedham Vale National Landscape, including its setting.

Q14.0.6

The Council are concerned that this is insufficient to address the s.98 duty and does not address impacts on the Dedham Vale National Landscape, including its setting.

Whilst the Council is not impacted directly in LVIA terms by the proposed offshore elements of the North Falls proposals we have concerns regarding the approach to the scope of projects in that they focus closely on promotion of the National Landscape through physical access rather than 'contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes' (our underlining) identified in government guidance

<https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>.

Although the significant impacts are visual, the intervisibility of the offshore infrastructure impacts indirectly on the character of the landscape. Landscape has a perceptual element. The gradual incremental closing down of the natural horizon with man-made structures gives the



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increasing effect of a tamed seascape rather than a perpetual natural element. This change has occurred rapidly this century. With this in mind, projects could more directly deliver landscape restoration that in turn delivers visual benefits, rather than just enabling physical access. Access could also be understood in terms of interpreting the change through art, music or writing.

Q14.0.7

Whilst it would be preferable that projects are limited to areas that are directly significantly visually impacted, we suggest that it could be impractical in delivery terms to be so constrained and that some broader criteria or parameters may be required.

The Council are concerned that this is insufficient to address the s.98 duty and does not address impacts on the Dedham Vale National Landscape, including its setting.

Q14.0.8

Whilst the Council is not impacted directly in LVIA terms by the proposed offshore elements of the North Falls proposals we have concerns regarding the scope of the enhancement scheme and suggest it should more closely align with the scale of the impact i.e. significant visual impacts over a 16km odd length of the coast (taken from the mouth of the Deben to Orford Ness). £10K appears a derisory sum.

The Council are concerned that this is insufficient to address the s.98 duty and does not address impacts on the Dedham Vale National Landscape, including its setting.

Q14.0.9

It might be preferable to have a backstop on delivery timetable e.g. 5 years which is often used for Section 106 monies where environmental enhancements are involved.

The Council are concerned that this is insufficient to address the s.98 duty and does not address impacts on the Dedham Vale National Landscape, including its setting.

Q14.0.10.

No comment.

Q14.0.11

Intervisibility is a critical element of landscape character and seascape assessment. Although the significant impacts are described as visual only, the intervisibility of the offshore infrastructure with the shore impacts indirectly on the character of the landscape. Perception of change in landscape or seascapes is therefore an important factor in assessing change. The gradual incremental closing down of the open horizon with man-made structures, no matter how far distant, gives the increasing effect of a tamed seascape rather than an unchanging natural element. This change has occurred rapidly this century. This could also be said to Impact on tranquillity which has a sensual not just an audible and visual element.



Q14.0.14

No comment

Q14.0.15

No comment

Q14.0.16

No comment


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