



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

NORTH FALLS OFFSHORE WIND FARM

Appendix I7 to the Natural England Deadline 7 Submission

Natural England's comments on 9.89 Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes (Rev 0) [REP6-062]

For:

The construction and operation of North Falls Offshore Wind Farm, located approximately 40 km from the East Anglia Coast in the Southern North Sea.

Planning Inspectorate Reference EN010119

15 July 2025

Appendix I7 Natural England's comments on 9.89 Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes (Rev 0) [REP6-062]

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

- [REP6-062] 9.89 Applicant's Response to ExA's Request for further information (Rule 17) - National Landscapes (Rev 0)

1. Detailed comments

1.1 Natural England welcomes the submission of in principle National Landscape Enhancement Scheme Principles [REP6-062] into the examination. However, Natural England advise that the Applicant has not adequately demonstrated how the project proposes to further the statutory purposes of the Suffolk & Essex Coast & Heaths National Landscape (in accordance with section 245 of the Levelling Up and Regeneration Act (2023) ('LURA duty').

1.2 This matter is of considerable concern given Natural England's advice that the project has the potential to significantly (in EIA terms) impact the special qualities of the SECHNL and special character of the Suffolk Heritage Coast, in particular when acting cumulatively with other existing, consented and proposed OWF projects. Moreover, with reference to paragraph 10 of REP6-062 (which states "*The Applicant has proposed a fund of £10,000 which it considers to be commensurate with the anticipated scale of effect of the Project on the special qualities of the SECHNL*"), we would emphasise that the Applicant should be following the mitigation hierarchy and harm should first be avoided, reduced and then mitigated before it can be compensated for. In light of the significant EIA-level impacts predicted, Natural England seeks a greater level of assurance that the mitigation hierarchy has been thoroughly applied in the project design, and then the provision of specific details regarding any necessary compensation for those impacts the earlier stages of the hierarchy have been unable to address.

1.3 We emphasise that the DESNZ Secretary of State (SoS) must apply the Duty (section 245 of the Levelling Up and Regeneration Act 2023), and in doing so consider the extent to which the proposed Enhancement Scheme has identified relevant measures to further the statutory purposes and evaluate these in the specific context of impacts to the SECHNL.

1.4 In response to the National Landscape Enhancement Scheme Principles [REP6-062], Natural England advise that:

- The Applicant has not justified how the proposed Enhancement Scheme fund of £10,000 is commensurate with the anticipated scale of effect of the Project on the special qualities of the SECHNL or whether a greater level compensation is required.
- It is not clear how the funds proposed can achieve enhancements that would meaningfully deliver improvements to landscape quality.
- Settling on a financial value before the required offsetting measures have been identified risks severely constraining the Applicant's ability to identify effective measures and therefore allow DESNZ to discharge the duty.
- It is not clear which special qualities the Applicant is proposing to enhance.
- The proposed Enhancement Scheme does not specify how the Project proposes to meet the SECHNL objectives in the Management Plan.

1.5 Natural England therefore advises that the Applicant develops an Enhancement Scheme strongly focussed on the significant impacts to the special qualities identified as part of the

Environmental Impact Assessment and then brings forward relevant measures in appropriate locations that can improve the landscape quality in ways that offsets those impacts.

1.6 Natural England strongly encourages the Applicant to engage with Suffolk County Council and the National Landscape team to discuss the scope of potential projects.