By email: HPCNuclear@pins.gsi.gov.uk

8th November 2017

Re: The Hinkley Point C (Nuclear Generating Station) Order 2013 – S.I 2013 No 648
Application for a non-material change to the Hinkley Point C Development Site
Consultation under Regulation 7 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011

Dear Sir or Madam

The Quantock Hills was the first landscape in England to be designated as an Area of Outstanding Natural Beauty (1956). The primary purpose of AONB designation is the conservation and enhancement of the landscape’s natural beauty. The Quantock Hills AONB Service, on behalf of its Joint Advisory Committee, undertakes its work according to this primary purpose – to try to ensure this beautiful and nationally protected landscape remains outstanding now and into the future.

Please accept the following within this context.

Paragraph 1.1.4 of the September 2017 Application Statement states that “the proposed changes (either considered individually or in combination) are not substantial and the effects of the changes would be almost imperceptible from viewpoints outside the site but changes do require variation to the DCO and some of its approved plans”. Whilst this statement may be true, we do not believe the information provided offers enough evidence to determine this. The AONB Service is concerned about the impacts on views from the nationally-protected Quantock Hills and we trust that the Inspector will consider a) how, and if, views may change b) what (if any) the change to the view will be and, importantly, c) if there will be a change to the judgements of impact magnitude and significance of visual effects.

The increase in length of the fuel storage building of 79 metres is, for example, not insignificant and the increase in width (bringing it much close to the adjacent building) will increase building mass on the site. Whilst paragraph 3.2.3 discusses the heights of the additional and amended buildings, there is seemingly no reference to the changes to mass and void and whether the extra structures and reconfigured layout will change the effects on views (in this case from the nationally-protected Area of Outstanding Natural Beauty).
It is worth noting that the impact of these changes, as we understand it, is compounded in respect of the significantly enlarged fuel storage building because, while decommissioning of the site is due to start in 2083, this building will continue to have an impact for a further 50 years before EDF can dispose of the spent fuel.

We therefore request that as part of the assessment of this application for non-material change, adequate consideration be given to any changes of effect on the Quantock Hills AONB – both in terms of views in and out of the protected landscape and the length of time over which these changes will be present in the landscape.

The AONB Service objected to the development of Hinkley Point C when the original DCO application was made. In light of its subsequent approval and ongoing construction operations, we remain concerned about its adverse effects on England’s first designated Area of Outstanding Natural Beauty.

Yours sincerely

_EJ Preece_

Emma-Jane Preece
Landscape Planning Officer