

## AONB Partnership ExA Questions pt 1

Ref	Also for	Question	AONB Partnership Response
AR.1.	The Applicant, AONB Partnership, ESC, SCC	<p>AONB</p> <p>The AONB Partnership set out detailed concern [RR-1170] with regard to the assessment of and significance of effects on the AONB and its statutory purposes:</p> <p>(i) Can the Applicant please respond in full to these concerns in respect of recreation and amenity?</p> <p>(ii) Can the Applicant also set out the effects on the AONB and its value as a recreational and amenity area through each of the construction, operational and decommissioning phases.</p> <p>(iii) Do the Councils and AONB Partnership consider the ES has fully recognised the benefits of the AONB as a recreational and amenity area and provided for appropriate mitigation?</p>	<p>The AONB Partnership note that the statutory primary purpose of the AONB designation is to conserve and enhance natural beauty. There are two secondary non-statutory purposes:</p> <ul style="list-style-type: none"> <li>• To take account of the needs of agriculture, forestry, fishing and other local rural industries and of the economic and social needs of local communities, paying particular regard to promoting sustainable forms of social and economic development that in themselves conserve and enhance the area's natural beauty; and</li> <li>• To seek to meet the demand for recreation so far as this is consistent with the statutory purpose of conserving and enhancing the area's natural beauty - and which preferably supports this purpose by increasing understanding, valuation and care for the area - and is also consistent with the needs of rural industries.</li> </ul> <p>The AONB Partnership consider that the ES does not fully recognise the benefits of the AONB as a recreational and amenity area. Therefore, the AONB Partnership considers that the applicant should identify the existing recreational and amenity benefits of the area. In part this is identified by the AONB commissioned Volume and Value Study in 2020 (with 2019 figures) that notes the tourism industry is worth £228M pa and supports 5,056 jobs. Evidence of the impacts energy coast projects is further identified in the in the Suffolk Coast Destination Management Organisation/AONB study in 2019. The study showed that 29% of those polled would be a lot less or a little less likely to visit the Suffolk coast having been made aware of energy project proposals. The applicant does not appear to concur with these findings.</p> <p>Furthermore, the AONB Partnership considers that the benefits go far beyond the volume and value of tourism and that other recreational and amenity benefits accrue, including health and well-being (physical and mental), reducing demand for travel to and pressures on other naturally beautiful areas and the value of ecosystem services of the amenity</p> <p>The AONB Partnership concur with many of the findings in the Summary of Effects for construction phase (table 15.11) and operational phase (table 15.12) in 6.3 Volume 2</p>

			<p>Main Development Site Chapter 15 Amenity and Recreation document that identifies a series of significant residual effects. The AONB Partnership considers that the value of the recreational and amenity value of the AONB has been downplayed in the Environment Statement and that the value for wider public benefits of the AONB natural beauty and special qualities has not been fully assessed. The AONB Partnership has not been party to the discussions relating to the magnitude of any mitigation proposals that might be contained within a section 106 agreement with the local authorities relating to the AONB as a recreational and amenity area. However, it notes the section 106 agreement for the Sizewell B Dry Fuel Store in relation to that developments impacts on the AONB and findings of the Suffolk Coast Limited study (that was part funded by the AONB Partnership) into the impacts on the visitor economy of the energy projects on the Suffolk Coast.</p>
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## AONB Partnership ExA Questions pt 4

Ref	Also for	Question	AONB Partnership Response
LI.1.1	The Applicant, ESC, SCC, Historic England, Natural England, Suffolk Coast & Heaths AONB Partnership, Parish and Town Councils, Together Against Sizewell C, Stop Sizewell C	<p><b>Design Approach</b></p> <p>It is imperative that the proposal represents a good quality sustainable design which can be effectively integrated into the landscape. As such, please comment on whether the following measures would ensure this would be achieved in the detailed design, construction and operation phases:</p> <ul style="list-style-type: none"> <li>i) A 'design champion'. Such a role would advise on the quality of sustainable design and the spatial integration of the both the Main Development Site and Associated Development Sites</li> <li>ii) A 'design review panel' to provide a 'critical friend' role. Such a role would provide comment on the development of sustainable design proposals</li> <li>iii) The production of an approved 'design code' or 'design approach document' which would establish the approach to delivering the detailed design specifications to ensure good quality sustainable design (as approved in the Hinkley Point C Connector Project (EN020001)).</li> </ul>	<ul style="list-style-type: none"> <li>i) The AONB Partnership consider it to be imperative that if a 'design champion' is employed to advise on the quality of design and spatial integration that the advice should consider the location of the proposed Main Development Site development being in a nationally designated landscape and not simply the design and function of the development. The development should seek to meet the purpose of the AONB and seek to avoid and minimise the inevitable negative impacts on the AONB.</li> <li>ii) The AONB partnership consider there could be a role for a design review panel if the terms of reference for the panel include the remit to minimise any negative environmental impact, including landscape impacts. This should seek to minimise the impact of the development on the defined qualities of the AONB such as landscape quality, scenic quality and tranquillity.</li> <li>iii) The AONB Partnership note the design code at Hinkley Point C Connector project but consider that any design code or design approach document should acknowledge that the proposals for Sizewell C sit in a nationally designated landscape, unlike Hinkley Point C, and as such has the highest level of protection from inappropriate development in planning policy.</li> </ul> <p>To deliver the aspirations outlined above the AONB Partnership consider that the applicant should facilitate a design champion and associated design review panel and design code/design approach document. The appointment of such a design champion, panel appointees and terms of reference for design code/design approach document should require the endorsement of the AONB Partnership and local authorities.</p> <p>The AONB Partnership considers that matters of design are critical to minimising impacts on the AONB and should have formed part of the proposed Development Consent Order and not as a requirement. The AONB Partnership</p>

		Please advise on how such measures could be secured. In addition, please comment as to whether any other measures or approaches are considered necessary?	and other stakeholders should be given a role in the agreement of such a requirement.
LI.1.2	ESC, SCC, Historic England, Natural England, Suffolk Coast & Heaths AONB Partnership, Parish and Town Councils, Together Against Sizewell C, Stop Sizewell C	<p><b>AONB – Adverse Effects</b></p> <p>Has sufficient weight has been given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of NPS EN-1? Please qualify your answer. If not, please identify what additional measures are required?</p>	<p>The AONB Partnership consider that paragraph 5.9.9 of the NPS EN-1 requires the former IPC (now Planning Inspectorate) to give substantial weight when deciding on applications. The paragraph is reproduced below:</p> <p style="text-align: center;"><i>National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions<sup>126</sup>. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.</i></p> <p>The AONB Partnership anticipates that the Examining Authority will give substantial weight to the statutory purpose of the AONB when making decisions.</p> <p>Furthermore, the AONB Partnership do not consider that the applicant has given sufficient weight to the statutory purpose of the AONB as it has repeated the design from Hinkley Point C, which is not in a nationally designated landscape and has therefore not sought to significantly adapt the design to avoid and minimise the landscape character, natural beauty and special qualities of the AONB.</p> <p>The AONB Partnership considers that the applicant should seek to avoid and minimise negative impacts on the AONB by the design and not simply replicate a design from Hinkley Point C. Therefore the AONB Partnership does not consider that sufficient weight has been applied to the statutory purpose of the AONB, its landscape, character and special qualities.</p> <p>Paragraph 5.9.12 recognises that development outside nationally designated areas can compromise the purposes of adjacent designations and that such</p>

			<p>projects should be sensitively designed. The AONB Partnership consider that the accommodation campus and temporary beach landing facility, in the setting of the AONB will compromise the purpose of the AONB designation as the defined characteristics of the AONB, including landscape quality, scenic quality, relative wildness and tranquillity, will be significantly negatively impacted.</p> <p>The AONB Partnership consider that the applicant should further review these elements of the application and seek to redesign those aspects that have a significant negative impact on the AONB.</p>
<b>LI.1.4</b>	ESC, SCC, Natural England and AONB Partnership	<p><b>Baseline Photographs and Visualisations</b></p> <p>Are you satisfied with the presentation of baseline photographs and visualisations prepared for the Proposed Development, including the Associated Development Sites?</p>	<p>The AONB Partnership are satisfied with the presentation of baseline photography and visualisations. It will not be commenting on Associated Development Site matters due to lack of capacity.</p>
<b>LI.1.5</b>	ESC, SCC, Natural England and AONB Partnership	<p><b>Night-Time Assessment of Lighting</b></p> <p>No specific guidance exists on which to base a night-time assessment of lighting on landscape and visual receptors. Are you satisfied with the approach adopted by the Applicant?</p>	<p>The AONB Partnership considers that the documents that form part of the Development Consent Order application do not sufficiently assess the impacts of lighting on relative tranquillity of the AONB, a defined characteristic of natural beauty, particularly during the 9-12 year construction phase from the temporary beach landing facility, necessary lighting for safe working and cranes. Some members of the AONB Partnership are aware of work the applicant has done relating to this topic where a comparison with Hinkley Point C has been undertaken and consider this work should have a wider audience for full appraisal and be applied to the proposals relating to Sizewell C.</p>
<b>LI.1.15</b>	ESC, SCC, Natural England, AONB Partnership	<p><b>Outline Landscape and Ecological Management Plan (oLEMP)</b></p> <p>The overarching objective of the oLEMP [APP-588] is to create a large area of Dry Sandlings Grassland bordered by native woodland and scattered trees/scrub. Alongside of the proposed increase in biodiversity value,</p>	<p>The AONB Partnership consider that there is potential for elements of the oLEMP to deliver landscape and biodiversity enhancements but as the plan is only outline it is not possible to fully assess at this stage. It supports an objective to enhance landscape value and biodiversity habitat in the AONB to offset negative impacts.</p>

		<p>the oLEMP considers that the new habitats would enhance the landscape character of the Estate Sandlands LCT. Are you satisfied, once established, that the LCT would be enhanced?</p>	
<p><b>LI.1.16</b></p>	<p>ESC, SCC, Natural England, AONB Partnership</p>	<p><b>Pillbox Field - Planting</b></p> <p>Would the one hectare of new woodland and woodland edge planting proposed within Pillbox Field provide adequate replacement planting for the loss of Coronation Wood? In addition, would the planting successfully provide enhanced visual screening of the power station infrastructure from Sizewell Gap and Sandy Lane?</p>	<p>The AONB Partnership consider the loss of Coronation Wood to be unfortunate given its heritage value as well as wildlife and screening functions. Cultural heritage, along with landscape quality and natural heritage features form part of the defined qualities of the AONB and as such the removal of Coronation wood has had a negative impact on the AONB.</p> <p>The AONB Partnership consider that new woodland and woodland edge planting is a poor substitute for the removal of an existing mature woodland. These two factors add up to the conclusion that new planting is not an adequate replacement for the removal of Coronation Wood. The AONB Partnership consider that any new planting should not be at the expense of the loss of any important grassland.</p> <p>The AONB Partnership consider or recognise that the new planting will offer some screening function for power station infrastructure but notes that screening is cosmetic and assumes that it proposed to hide the negative impacts on the landscape character from the development and the defined qualities of the AONB including landscape quality, scenic quality, relative wildness and natural heritage features. The new planting will not fully achieve this given the scale and height of some of the buildings proposed as part of the development.</p>
<p><b>LI.1.23</b></p>	<p>AONB Partnership</p>	<p><b>Photomontages/Wireframes</b></p> <p>Please expand on why you consider the submitted visualisations are not fit for purpose in respect of construction impacts, as detailed in [RR-1170]. Please also confirm how the production of material similar to that provided for the Wylfa project would assist the ExA?</p>	<p>The AONB Partnership noted in its relevant representations that:</p> <p><i>the EDF Computer Generated Imagery are not fit for purpose to give a visual representation of the impacts of construction</i></p> <p>This statement relates to the computer generated imagery available to the public during public consultation and did not provide enough detail to see the impacts on the AONB-eg AONB boundary not available.</p>

		Are you satisfied in respect of operational visualisations?	The AONB Partnership consider that the production of material similar to that produced for Wylfa, see for example Wylfa Newydd Project Illustrative Construction and Operation Visualisation for Viewpoint 27, and Viewpoint 38 at Felin Gafnan <a href="https://tinyurl.com/43efjykp">https://tinyurl.com/43efjykp</a> would provide the Examining Authority an easier understanding of the operational and construction impacts on the AONB's landscape quality, scenic quality and relative tranquillity for both the operational and construction periods.
<b>LI.1.35</b>	ESC, SCC, AONB Partnership, Natural England	<p><b>Ancillary and Plant Buildings</b></p> <p>The ancillary and plant buildings are likely to be clad with profiled sheet metal. It is proposed that they would have a consistent façade treatment which is likely to comprise a darker, visually recessive colour. Are you satisfied that the use of a darker finish would allow the ancillary and plant buildings to appear grounded within the wider operational platform?</p>	<p>The AONB Partnership considers that decisions relating to any coloured cladding should draw on the AONB commissioned study <i>Guidance on the selection and use of colour in design</i>, see <a href="https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/SCH-Use-of-Colour-Guidance-v7.pdf">https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/SCH-Use-of-Colour-Guidance-v7.pdf</a></p> <p>Careful use of colour may support the aspiration for parts of the development to have a less negative impact on the statutory purpose of the AONB. and should be a requirement to any consent given. The AONB Partnership considers that this element of design should be subject to binding independent advice to the applicant via specialist consultancy, drawing on the AONB commissioned work on the use of colour. The AONB Partnership consider this should be a requirement or conditioned as part of any consent.</p>
<b>LI.1.40</b>	ESC, SCC, AONB Partnership, Natural England	<p><b>Accommodation Campus – Massing Model and Photomontage/Wireframe Visualisations</b></p> <p>Following the Procedural Decision letter in December 2020 [PD-0009] the Applicant has supplied an annotated 3D massing model and photomontage/wireframe visualisations from three viewpoints in respect of the accommodation campus. Please review</p>	The AONB Partnership have no comment to make on the photomontage/wireframe visualisations presented of the proposed accommodation campus from the three viewpoints beyond the previously stated comments about this 'major' development being in the setting of a nationally designated landscape and as such should pay regard to the purpose of the AONB.

		the additional information and provide any comment considered necessary.	
<b>LI.1.41</b>	ESC, SCC, Natural England, AONB Partnership	<p><b>Accommodation Campus – Key Design Principles</b></p> <p>Alongside of the relevant parameter plans, the Key Design Principles listed at Table A.1 [APP-587] provides the detail for the delivery of the proposed accommodation campus. Are you satisfied that Table A.1, as drafted, is sufficiently robust and precise?</p>	<p>The AONB Partnership consider that additions to the Key Design Principles listed in table A.1 [APP-587] should include the following given its location adjacent to the nationally designated landscape and policy constraints:</p> <ul style="list-style-type: none"> <li>• An assessment of the impacts of the proposals on the AONB</li> <li>• Design, including use of colour, massing and on site location to minimise visual and other impacts on the AONB</li> <li>• Use of sustainable materials</li> <li>• Exemplar environmental performance of buildings in terms of energy use, water treatments</li> <li>• End of life plan for campus buildings-maximise recycling opportunities by planned design</li> </ul>
<b>LI.1.42</b>	ESC, SCC, Natural England, AONB Partnership	<p><b>Accommodation Campus – AONB</b></p> <p>In respect of the location of the proposed accommodation campus, please provide a detailed response regarding potential effects on the statutory purpose of the AONB.</p>	<p>The location of the proposed accommodation campus is adjacent to the nationally designated AONB. Therefore, the AONB Partnership considers that the applicant should adhere to a range of policy documents in developing its proposals. These include: National Planning Policy Framework The application for Sizewell C will be determined by the Planning Inspectorate but it is worth noting what the <b>draft</b> revisions to the National Planning Policy Framework (para 172), which should be a material consideration in the Development Consent Order process, has to say on development impacting on nationally designated landscapes and their setting:</p> <p><i>Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.</i></p> <p>Furthermore, Planning Practice Guidance is relevant. The Planning Practice Guidance is a material consideration in Development Consent Order process.</p>



			<p>The National Planning Practice Guidance published by Government provides amplification on the National Planning Policy Framework and explains key issues in implementing the policy. The guidance on AONBs was updated in 2019. It recognises that where poorly located or designed, development within the settings of AONBs that development can do significant harm to the nationally designated landscape. The Planning Practice Guidance states:</p> <p><i>Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.</i></p> <p>Any development in the setting of the AONB, particularly a large scale development adjacent to a nationally designated landscape has the potential to cause significant harm to its statutory purpose. The defined and agreed (with the applicant, Suffolk County Council, Suffolk Coastal District Council [now East Suffolk Council] and the AONB Partnership) natural beauty and special quality characteristics of the area relate to: landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage.</p> <p>The AONB Partnership do not consider that a development of this scale, in this location, contributes to the statutory purpose of the AONB and would indeed cause harm to several of its defined characteristics as listed above.</p> <p>In summary:</p> <ul style="list-style-type: none"> <li>• Landscape quality will be negatively impacted by loss of character by the development of a built accommodation campus</li> <li>• Scenic quality will be harmed by large scale development that does not form part of AONB character visible from within the AONB and adjacent to AONB boundary</li> </ul>
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			<ul style="list-style-type: none"> <li>• Relative wildness will be lost by the introduction of a built element close to the AONB</li> <li>• Relative tranquillity of the AONB will be lost by impacts from noise and light from the development adjacent to the AONB over a substantial time period</li> <li>• Natural heritage features, such as mobile wildlife will be negatively impacted from the development by loss of routes to the AONB and habitats supporting wildlife that travels to and from the AONB</li> </ul>
<b>LI.1.47</b>	ESC, SCC, AONB Partnership, Natural England	<p><b>SSSI Crossing – Assessment (Change 6)</b></p> <p>Would the changes made to the embankment slopes on the SSSI crossing [AS-181] better integrate the crossing into the landscape from coastal viewpoints? Are you satisfied that because of the change, the level of significance of effects during the operational phase would remain as stated in [APP-216]?</p>	<p>The AONB Partnership consider that the proposed changes to the bank embankment slopes of the SSSI crossing do not make a significant change to how it is integrated into the landscape. More importantly it considers this as insubstantial given the overall impact of the Main Development Site and Construction Site on the defined qualities of the AONB and considers that as a minimum it concurs with the assessment of the views of operational as being of Major to Moderate (significant) and adverse from the AONB promoted Suffolk Coast Path and Sandlings Walk, where many residents and visitors will experience the development.</p> <p>The AONB Partnership considers the level of significance of effects from the revised application relating to the SSSI crossing during operation would remain similar to that in original application.</p> <p>The AONB Partnership consider that the Guidance in the selection and Use of Colour work commissioned by the AONB should inform the design of elements of the SSSI crossing</p>
<b>LI.1.48</b>	AONB Partnership	<p><b>Alison Farmer Associates Report</b></p> <p>Please provide a copy of the Alison Farmer Associates report as referred to in your response to the proposed project changes [AS-307].</p>	<p>This document is available from <a href="https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Sizewell-C-Beach-Landing-Facility-Review-December-2020.pdf">https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Sizewell-C-Beach-Landing-Facility-Review-December-2020.pdf</a> or <a href="mailto:schaonb@suffolk.gov.uk">schaonb@suffolk.gov.uk</a> and appendix 1 of this doc.</p>
<b>LI.1.58</b>	ESC, SCC, MMO, Natural England and	<p><b>Temporary Beach Landing Facility – Assessment (Change 2)</b></p> <p>Are you satisfied with the findings of effects relating to the temporary BLF</p>	<p>The AONB Partnership note the statement in the Environment Statement Addendum [AS-181] para 2.8.7 that:</p> <p><i>No additional mitigation has been identified to that embedded in the</i></p>

	AONB Partnership	detailed in section 2.8 [AS-181] as compared to the judgements in [APP-216]?	<p><i>changed design</i></p> <p>and consider that the Beach Landing Facility and Temporary Beach Landing Facility have extremely limited embedded mitigation and such features do no contribute to the purpose of the AONB designation.</p> <p>Furthermore, it recognises that both the enhanced Beach Landing Facility and Temporary Beach Landing Facility and more activity off the coast due to more deliveries by barge, tug and ships into a highly sensitive landscape be a high magnitude, major (significant) and adverse and concur that the effects will be of high magnitude from the AONB.</p> <p>A Permanent Beach Landing Facility in the AONB and a Temporary Beach Landing Facility in the setting of the AONB and associated craft are not features that contribute to the purpose of the AONB and negatively impact on defined features such as landscape quality, scenic quality and tranquillity.</p> <p>Where the AONB Partnership diverge from the assessments that of impacts on the AONB is the reference to a localised extent of impacts eg para 2.8.54 of Environment Statement Addendum [AS-181] that states:</p> <p><i>The effects would continue to remain generally of high-medium to medium magnitude, remain major to major-moderate (significant) and adverse between approximately Dunwich Coastguard Cottages and Thorpe Ness, with the temporary BLF presenting a localised addition to the construction effects of the main development site in the coastal environment.</i></p> <p>The AONB Partnership consider that impacts of this magnitude and significance have a negative impact on the AONB designation and its statutory purpose as a whole. It does not consider that reference to localised impacts of this magnitude and significance is helpful as the impacts are impacting the very purpose of the AONB as recognised in the National Policy Statement for Nuclear Power Generation (EN-6), para C.8.73, that states:</p>
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			<p><i>...Therefore the Appraisal of Sustainability has found that there is the potential for some long lasting adverse direct and indirect effects on landscape character and visual impacts on the Suffolk Coast and Heaths AONB, with limited potential for mitigation.</i></p> <p>The damage from elements of the proposed development is acknowledged to impact the AONB. Significant negative impact on the AONB cannot be discounted as localised as the AONB is a single entity.</p> <p>The AONB Partnership are satisfied with these amended findings and that the revised temporary BLF would have wider localised effects as discussed in AS 181 para 2.8.24 -26 on the landscape; rather than the more limited extent effects identified in APP 216</p>
<p><b>LI.1.68</b></p>	<p>ESC, SCC, Natural England, AONB Partnership</p>	<p><b>Mitigation</b>  What, if any, further mitigation is considered necessary in relation to the MDS? If necessary, how do you consider such measures should be secured?</p>	<p>The AONB Partnership recognises the section 106 process to compensate and mitigate impacts of development. It has set out its views on how a Landscape and Environment fund could compensate and mitigate impacts on the AONB and its setting in a 'Position Statement' agreed and published in January 2021. This can be viewed at: <a href="https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/03/AONB-Partnership-Position-Statement-on-Potential-Sizewell-C-Fund.pdf">https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/03/AONB-Partnership-Position-Statement-on-Potential-Sizewell-C-Fund.pdf</a> or a copy can be secured on request from <a href="mailto:schaonb@suffolk.gov.uk">schaonb@suffolk.gov.uk</a></p> <p>The AONB Partnership is currently developing its thoughts on the magnitude of what such a compensation and mitigation fund might look like for both the main development site and the construction site based on the previously agreed section 106 agreement signed by Suffolk Coastal District Council (now East Suffolk Council), Suffolk County Council and EDF Energy for the Dry Fuel Store associated with Sizewell B</p>

# APPENDIX 1 Alison Farmer Report on Preliminary Environment Information; Beach Landing Facility

## Sizewell C Beach Landing Facility Comments on Preliminary Environmental Information (PEI) Chapter 3 – Freight Management Strategy

### 1 Introduction

#### 1.1 Appointment

- 1.1.1 Alison Farmer Associates (AFA) was appointed by the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) to undertake a review of the Sizewell C PEI: Chapter 3 Freight Management Strategy in the context of the AONB designation.
- 1.1.2 Documents which have been reviewed have included:
- PEI Chapter 3: Freight Management Strategy
  - ES Chapter 13 Landscape and Visual and associated appendices/figures

#### 1.2 Scope of work

- 1.2.1 This review focuses on the AONB and the landscape and visual effects arising from the proposed changes to the Beach Landing Facilities. Effects on landscape beyond the AONB designation are not considered.
- 1.2.2 Chapter 3 of the Consultation Document Nov-Dec 2020 sets out the potential changes to the Freight Management Strategy. These changes are made to ensure transport of freight transport is as sustainable as possible and to take account of stakeholder responses which advocate maximum use of rail and sea.
- 1.2.3 This review is based on information provided within the documents listed above. It is noted that the PEI Chapter 3 sets out if additional assessment work is required in relation to changes to the Permanent Beach Landscape Facility and addition of one of the four options for a further temporary facility. This review seeks to constructively highlight broad issues and any gaps in information. It seeks to inform the AONB formal response to Consultation as well as to highlight aspects which need to be addressed within any update of the existing LVIA (Chapter 13 of the Environment Statement (ES)). Where specific aspects of the scheme are not mentioned in this report it should not be taken as acceptance of what is proposed.

#### 1.3 Approach

- 1.3.1 The review has comprised desk top study only.

## 2 Enhancement of Permanent Beach Landing Facility

### 2.1 Summary of Effects set out in Chapter 13 of ES

2.1.1 The permanent BLF is required for the delivery of large Abnormal Indivisible Loads (AILs). The ES considered and set out the landscape and visual effects of the proposed development (including the PBLF) in Chapter 13 of the ES. The assessment identified that there would be significant adverse effects on the following receptors (in part due to the proposed BLF).

- Coastal Dunes and Shingle Ridges LCT (both immediately adjacent to Sizewell and also extending along the coast to the north)
- Visual Receptors Group 8 Dunwich to Minsmere Coast
- Visual receptors Group 12 Minsmere to Sizewell Coast

2.1.2 Moderate adverse effects were also identified along the coast to the north and south of the main construction site.

### 2.2 Proposed Changes to Permanent BLF

2.2.1 Since submission of the Application, further work has identified potential for more material to be brought to site by sea including more regular deliveries of AILs.

2.2.2 The table below summaries the key proposed changes to the PBLF in order for it to receive increased deliveries of AILS by up to 333% (i.e. from 30 barges per campaign to 100 barges per campaign).

ES Permanent BLF	Enhanced Permanent BLF
70m long	100m long (addition of 10 piles)
No submerged beams or grillage required	Submerged beams and grillage required across an area of 3,000m <sup>2</sup> (additional 50 timber piles – presumed submerged)
Reprofiling of sea bed for barges to land	No reprofiling of sea bed required
Deck removed when not in use	Deck removed when not in use
30 beach landings between 1 April – 31 October	100 beach landings between 1 April – 31 October

2.2.3 In simple terms the proposed changes will result in increased length of pier, introduction of grillage and increase usage. However, the level of information provided in the PEI is limited and no visual material is provided to show the proposed changes. Figure 2.10 of the ES shows the PBLF but when it is not in use. Visualisation of it in use (as a worst case scenario) and in relation to the proposed enhancement would be beneficial.

2.2.4 Similarly, no further information is provided regarding the increased number of vehicular movements which will be required within the AONB in order to unload

the AILs from the barges and deliver them to the construction site. Reference is made only to the reduction in vehicular movements on the main road network.

## 2.3 Likely Changes to Landscape Character, Visual Effects and AONB Special Qualities

- 2.3.1 Were landscape and visual effects have already been identified as significant adverse within the ES, the proposed changes to the PBLF are unlikely to make a difference to overall judgements. However, this is not to say that the proposed changes will have no effect. Clearly increased activity and use of the PBLF will also give rise to increase vehicular movements and noise, as well as increased activity in offshore waters. As a result there will be further negative effects on the AONB's defined qualities of landscape quality, scenic quality and tranquillity
- 2.3.2 Where landscape and visual effects are judged to be moderate adverse the proposed changes to the PBLF may give rise to an increase level of effect particularly in views along the coast where the BLF is seen to project further out to sea, and more AILs are being delivered to site.
- 2.3.3 It is noted in Table 3.6 page 48 that no further assessment is required for the enhancement to the permanent BLF. However, given that the effects will occur within a nationally designated landscape it is considered important that they are nevertheless set out in detail and evidence provided as to where effects have been mitigated as far as possible. The proposed alteration to the PBLF is likely to give rise to affects in the AONB such as:
- Changes in the perceived coastal geometry and visual line of the coast
  - Increased visual clutter out to sea
  - Visual intrusion and further loss of tranquillity
  - Increased activity on the shoreline including HGV movements
  - Increased disruption to the coastal path

## 2.4 Additional Information/Clarification Required

- 2.4.1 To be clear about the detailed effects and to ensure adequate mitigation in relation to the AONB it would be helpful to have the following additional information:
- detailed drawings of enhanced PBLF structure/layout
  - Information on method of construction (especially grilling and extent to which any new structures will be visible above the waterlevel)
  - additional visualisation from VP 31 looking along the coast and out to sea to show the effect of PBLF and proposed changes.
- 2.4.2 Additional clarification is also required in relation to the following:
- Any increased length of time required to construct the enhanced PBLF

- Clarification as to whether the PBLF would be used at night.
- Clarification as to whether the proposed enhancement would result in any alteration to the use of the PBLF during operation of Sizewell C e.g. once every 5-10 years for 1 week at a time



## 3 Options for New Temporary BLF

### 3.1 Summary of Four Options

3.1.1 The PEI sets out four options for the temporary BLF. It highlights that, as a temporary feature, it is likely to be in operation up to 2030 (para 3.3.16 of consultation documents Nov-Dec 2020), although it is noted that the construction phase at Sizewell C could last until 2032 (para 3.1.3). After this time it will be dismantled with the removal of the pier and conveyor and restoration of the beach/coastal path route. The table below shows a comparison of the four temporary BLF options provided in the PEI.

Option	Length of pier	No of Barges per delivery/campaign	Shape of Pier	Night operation	Dependant on tides	Tonnage
1	120m	1 barge/70 over 7 months	Straight	Yes	Yes	<200,000
2	150m	1 barge/100 over 7 months	T shaped	Yes	Yes	>200,000
3	270m	2 barges/400 over 7 months	Self elevating platform	Yes	No	<1,400,000
4	400m	2 barges/460 over 7 months	Self elevating platform	Yes	No	>1,400,000

3.1.2 In all options the TBLF will be longer than the PBLF. It is also noted that the TBLF is likely to be narrower and the structural components (such as piling) would also be reduced in size accordingly (para 3.3.33). It is not clear why in Option 1 a 120m pier can only accommodate 70 deliveries over a campaign where as the PBLF at 70m or even 100m long can accommodate 100 barges per campaign.

### 3.2 Key Additional Effects Which May Arise

3.2.1 All four options are likely to give rise to landscape and visual effects and impact on the special qualities of the AONB. In simple terms the longer and more substantial the pier the more visible it is likely to be for greater distances along the coast. In addition the more activity and deliveries by barge the greater the effects on landscape character and special qualities of the AONB. All four options will result in physical landscape effects across the beach in the vicinity of the main construction site. These effects are considered in more detail below:

#### 3.2.2 Landscape Effects:

- Physical fragmentation of the shoreline due to hopper crossing the beach to the main construction site
- Cumulative visual effects when considered in association with the PBLF
- Alterations to the perceptions and geometry of the coastline when viewed from more distant locations along the coast. Reference should be made to the Suffolk Coast Sea Defences, Potential Landscape and Visual Effects, [prepared as part of the Touching the Tide Landscape Partnership in June 2016] highlights the sensitivity of this part of the coast in terms of simple coastal geometry (pages 45/46).

### 3.2.3 Visual Effects:

- The consideration of the four TBLF will require a comparison of the visual effects of each. Use of ZTVs for each option will help to demonstrate how a longer length of pier will give rise to increased visibility of structures in the offshore environment and thus along the coast. This will also inform how this increased visibility may affect the special qualities of the AONB
- Particular viewpoints which will need review include: 6, 17, 26 and 31.

### 3.2.4 Defined AONB Special Qualities:

- Loss of tranquillity due to noise from hopper usage and movement of aggregate
- Further loss of tranquillity due to use of night time lighting
- Loss of naturalness of the coast and simple geometry through the introduction of new manmade elements
- Cumulative landscape and visual effects of the TBLF and the PBLF. Options to mitigate and minimise cumulative effects should include options in terms of proximity of the two piers. Locating the piers closer together may reduce/increase effects.

## 3.3 Additional Information/Clarification Required

### 3.3.1 Additional information is required on the following:

- Width and height of pier and hopper
- Layout plan showing both Temporary and Permanent Piers, hopper, conveyor, access road, coastal path, sea defence, main construction site and any new temporary storage facilities for aggregate.
- Underpass of coastal path beneath the conveyor (noted on page 50 table 3.7 of PEI).
- ZTVs of TBLF options and in association with PBLF – consideration of design of structures to work visually together
- Assessment of cumulative effects of structures on the foreshore
- Liaison with assessment of noise/vibration and recreational effects. The former should include effects on users of the Coastal Path.
- Confirmation that no aggregate or delivered materials will be stored on the beach and that it will be directly transported to stockpiles within the main construction site
- Confirmation that no vehicular access onto the TBLF pier is required and that the pier will only accommodate the conveyor
- Details of proposed lighting
- Preparation of new visualisations showing day and night time views and cumulative effects
- Information of length of time it takes to unload a 3,000 tonne delivery from one barge.

## 4 Conclusions

### 4.1 Summary

- 4.1.1 The proposed alterations for delivery of freight to the site especially during construction has sought to enhance the capacity for sustainable freight transport and at the same time respond to stakeholders advocating the maximum use of rail and sea. The proposed enhancement of the Permanent BLF and options for a temporary BLF seek to address this. Nevertheless, they will give rise to additional structures and activity within the AONB and therefore additional negative impacts on the defined qualities of this nationally designated landscape both within and beyond the proposed development area
- 4.1.2 The ES identified that there would be significant adverse effects on the landscape, visual receptors and special qualities of the AONB in the vicinity of the site and along the coast to the north/south. The proposed changes to the PBLF and possible addition of a temporary BLF will not alter the category of effects where they are determined as already significant adverse. However, from some locations further along the coast, the proposed changes will result in an increase in effect and this will need to be clearly set out.
- 4.1.3 In reaching an optimum balance between road, rail and sea transportation of materials it is essential that the high value of the AONB coastal landscape is given sufficient weight in decision making. It does not appear from the current documentation that an assessment of that balance has been undertaken.
- 4.1.4 The proposed changes to the DCO application would increase the harm to defined AONB qualities in this part of the nationally designated landscape. Any preferred BLF proposals should demonstrate minimisation of adverse effects on the AONB through careful design and mitigation.