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May 2021

**Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership
comment on changes to Sizewell C Development Consent Order application**

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership **maintain the position it outlined within its submitted Relevant Representations** made in September 2020 and its comment on **changes to the Sizewell C Development Consent Order** made in May 2021.

These Written Representations are made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership. The Partnership is made up of around 25 organisations who are committed to the purposes of the AONB designation, to conserve and enhance natural beauty. **For the avoidance of any doubt, some individual members of the Partnership are public bodies or statutory undertakers who have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.**

This response is submitted in the context of National Policy Statement for Nuclear Power EN6 para C.8.73 (vol II) that states:

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.

And para 3.10.3 from vol I of National Policy Statement for Nuclear Power EN6 that states:

There is the potential for long-term effects on visual amenity, especially at Sellafield because of the proximity to the Lake District National Park, and at Sizewell, given the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.

The AONB Partnership concur with these views that the proposals for a new nuclear power station will cause harm to the nationally designated landscape.

The AONB Partnership's main concerns are summarised below:

- 1) **Impact on statutory purpose of the AONB**
- 2) **Consideration of the AONB**
- 3) **Cumulative impacts**
- 4) **Other AONB issues**
- 5) **Impacts on special qualities**

1) Impact on statutory purpose of the AONB

The statutory purpose of an AONB is to conserve and enhance natural beauty. Public bodies and statutory undertakers have a duty to consider the purposes of the AONB designation in decision making.

The Suffolk Coast & Heaths AONB's natural beauty is defined by a series of defined features as agreed between the applicant, Suffolk Coastal District Council (now East Suffolk Council), Suffolk County Council and the AONB Partnership¹. These defined features are based on Natural England's *Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England*² and include the following characteristics:

- Landscape quality
- Scenic quality
- Relative wildness
- Relative tranquillity
- Natural heritage features
- Cultural heritage

The AONB Partnership consider that the proposals:

Do not conserve or enhance **landscape quality** as they do not contribute to the intactness of the visual function of the landscape, degrade the condition of natural landscape features and is an incongruous feature to perceived natural beauty. The impacts on viewpoints and character within the AONB will be considerable, long lasting and in many cases so significant that they cannot be mitigated.

Do not contribute to **scenic quality** by providing a distinctive sense of place, (as it is a duplicate of the Hinckley C design), contribute to the striking AONB landscapes and ecology or appeal to the senses that are anticipated to be experienced in such a location.

Do not contribute to **relative wildness** including a sense of remoteness, during construction and operation and introduce an element of human activity at a large scale and impacting the experience of vast Suffolk skies.

Do not contribute to **relative tranquillity** by the introduction of new roads, rail routes, Beach Landing Facilities, built development light and noise.

Do not contribute to **natural heritage features** by the loss of nationally important wildlife habitat (loss of part of Site of Special Scientific Interest) and introduction of man-made topography, sea defences and distribution of spoil to reprofile land impacts on wider area

Does not contribute to **cultural heritage** by the introduction of large scale off the shelf buildings and new pylons that dwarf residential settlements that contribute to AONB character and does not contribute to characteristic land management practices.

¹ Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heaths-2016.pdf>

² https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb/supporting_documents/Guidance%20for%20assessing%20landscapes%20for%20designation%20as%20National%20Park%20or%20AONB%20in%20England.pdf

Furthermore, the AONB Partnership consider that impact on one part of the AONB damages the AONB designation as a whole. It does not agree with the applicant's suggestion that impacts will be localised, as the proposals represent a significant negative impact on the statutory purpose of designation.

The AONB Partnership considers that the introduction of proposals such as:

- New pylons
- An operational main development site covering 23 hectares (33 hectares when sea wall, soft coastal defences, car park, access road are all included), with significant stacks
- Artificial sea defences
- A new access road, rail spur, Beach Landing Facility
- A construction site (for 9-12 years) effectively cutting the AONB in half

into the nationally designated AONB as impacting the statutory purpose of the AONB, to conserve and enhance natural beauty. It considers that these proposals will prevent land from being able to meet the purpose of the AONB designation.

Furthermore, the AONB Partnership have concerns about proposed development in the setting of the AONB, in particular the proposed accommodation campus, meeting the purpose of the AONB designation. Planning Practice Guidance, which should be a material consideration in the Development Consent Order process which says:

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.

It considers that the accommodation campus does not contribute to the purpose of the AONB designation.

2) Consideration of the AONB

The proposals will require the loss of 23 hectares of AONB land to be lost for the purposes off the AONB designation for the operational lifetime of the development. Around 250 hectares of AONB will be unable to deliver statutory purposes during the construction phase of 9-12 years.

The AONB Partnership does not consider that the applicant has given appropriate weight in developing its proposals to the AONB. In addition to the impact on the AONB summarised above it makes the following points:

A design that has been copied from Hinkley Point C does not demonstrate any consideration by the applicant of the proposed Sizewell C new nuclear power station being in a nationally designated AONB.

The changes to the Development Consent Order application made in late 2020 will ensure a significant increase in the impacts to the AONB. The introduction of a temporary beach landing facility that will extend 500m off the AONB coast, rise 12m out of the sea, have machinery up to 60m high operating on it will have significant impacts on the defined natural

beauty characteristics of the nationally designated landscape and its associated Heritage Coast seascape, namely:

- Landscape quality: Introduction of a significant non-characteristic man made structure into the AONB.
- Scenic quality: Introduction of an incongruous feature into the AONB which will be visually intrusive from long distance views and detract from natural visual patterns both on land and at sea.
- Relative wildness: Loss of a sense of remoteness due to introduction of man-made features with moving parts and significant increase in inshore vessels.
- Relative tranquillity: Significant impacts to a quiet environment due to noise from conveyors, machinery vehicles. Increase in light pollution from lighting associated with the beach landing facility.

The beach landing facility would virtually double the width of the development site during construction in a west to east orientation. It is considered that this would increase the impact of the development during construction phase from receptors within the AONB to north and south. The impacts of the beach landing facility have been assessed by a consultant instructed by the AONB Partnership³.

The AONB Partnership recognises that natural heritage features as part of the defined characteristics of the AONB. The crossing of the Site of Special Scientific Interest (SSSI) will have significant negative impact on both the landscape quality of the AONB and the natural heritage features (including wildlife) contained within it. The loss of SSSI is regrettable and cannot be satisfactorily offset. The AONB Partnership considers that the best mitigation for a SSSI crossing, which would result in significantly less SSSI being lost, is to incorporate a triple span bridge rather than the proposed culvert design. It considers this to be preferable as such a design would seek to minimise negative impacts on wildlife.

The AONB Partnership consider that the changes to the Development Consent Order will cause a disproportionate and significant increase to the damage to the AONB and that the proposed changes do not give appropriate consideration to the AONB.

3) Cumulative impacts

The AONB Partnership consider the cumulative impacts of the proposed development have not been given appropriate weight when developing the proposals. The proposals will:

- 1) Negate the mitigation of the careful simple design of Sizewell B.
- 2) Negate the screening effect of Sizewell A by Sizewell B from view points to the north
- 3) Extend the relatively contained nuclear complex by doubling its size.

Furthermore, the AONB Partnership consider that the impacts of other significant energy projects in the AONB should be fully considered when assessing the Sizewell proposals. It considers that the current assessments does not give appropriate weight to the in combination effects, particularly since the changes to the Development Consent Order were accepted.

³ Alison Farmer Associates: Sizewell C Beach Landing Facility Comments on Preliminary Environmental Information (PEI) <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/05/Sizewell-C-BLF-Review-Dec-20-Final.pdf>

4) Other AONB issues

The AONB Partnership considers that the location of an outage car park in the AONB is inappropriate, unnecessary and does not meet the purposes of the AONB. The AONB Partnership does not consider that the case for siting the outage car park within the AONB has been sufficiently made and that alternatives outside the AONB have not been given appropriate consideration in relation to impacts of the proposals on the AONB. Namely significant impacts on the AONB's defined characteristics of landscape quality, scenic quality and relative remoteness.

The AONB Partnership has concerns relating to the loss of public access via public rights of way and open access areas. This loss of access will compromise the experience for those using such routes or areas and the experience of the AONB. There is particularly high negative impact on the Suffolk Coast Path/proposed England Coast Path. The loss of public access (via public rights of way open access areas) and a compromised experience for those using such routes or areas.

The AONB Partnership considers the loss of part of the Site of Special Scientific Interest unacceptable, particularly as such designated sites are in the defined natural beauty characteristics, including natural heritage features.

The AONB Partnership consider the current proposals for crossing the Site of Special Scientific Interest will have a significant impact on the defined characteristics of the AONB including landscape quality.

5) Impacts on special qualities

The AONB Partnership consider the proposals for Sizewell C have a significant impact on the defined special qualities indicators as agreed by the applicant, Suffolk Coastal District Council, [now East Suffolk Council], Suffolk County Council and the AONB Partnership in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators document⁴.

Health and wellbeing will be negatively impacted as the AONB will be less attractive for recreational purposes, particularly walking.

The relationship between people and place will be negatively impacted by the loss of natural beauty indicators.

The value of the tourism industry in the AONB, worth £228M in 2019 and supporting 5,056 jobs⁵ will be significantly impacted due to the loss of defined AONB characteristics that provide the canvas for much of the tourism industry on the Suffolk Coast to thrive. Research by the Suffolk Coast Destination Management Organisation (supported by the AONB Partnership) on the impact of energy projects on the Suffolk coast revealed that a net 17% decrease in visitors likely to visit the Suffolk coast⁶.

The AONB Partnership consider that Sizewell C, as proposed, would substantially damage the Suffolk Coast & Heaths AONB.

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⁴ Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators <https://www.suffolkcoastandheaths.org/wp-content/uploads/2021/01/Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heaths-2016.pdf>

⁵ Economic Impact of Tourism Suffolk Coast and Heaths AONB – 2019: Destination Research

⁶ <https://www.thesuffolkcoast.co.uk/shares/The-Energy-Coast-Snapshot-Findings.pdf>