



The Sizewell C Project

9.10.20 Initial Statement of Common Ground - Suffolk Coast and Heaths AONB Partnership

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1 INTRODUCTION

1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of the application for a development consent order ('DCO') to the Planning Inspectorate ('PINS') under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project.

1.1.2 This SoCG (Version 1) has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and shared with Suffolk Coast & Heaths AONB Partnership (SCHAONBP). Collectively SZC Co. and Suffolk Coast & Heaths AONB Partnership are referred to as 'the parties'. In terms of the status of this version, the SCHAONBP is reviewing the document and it is the intention of both parties to provide an updated version at Deadline 3 to include further details from the AONB Partnership on its position on each matter.

1.1.3 This SoCG has evolved through a programme of engagement and series of versions as detailed in Appendix A.

1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project').

1.2.2 This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.3 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>.

1.2.4 **Table 1** details the matters being discussed between the parties, which will be updated in subsequent versions of this SoCG.

1.3 The SCHAONBP

1.3.1 The AONB Partnership was formed in 1993 and is comprised of organisations with an interest in the AONB. Membership of the Partnership

NOT PROTECTIVELY MARKED

evolves over time but includes representatives from local authorities, businesses, environmental organisations, farming bodies, government agencies, community bodies and tourism industries. The Partnership works together to secure the purposes of the AONB designation which in turn reflects individual organisational objectives. It also oversees the preparation and delivery of the Suffolk Coast and Heaths AONB Management Plan. The Partnership meets at least twice a year to discuss significant issues within the AONB, and the delivery of the Plan. The AONB staff team, funded by Defra and local authorities, and hosted by Suffolk County Council, provides the secretariat for the Partnership. Furthermore, the staff team works to conserve and enhance the special qualities of the AONB and to work with others to produce, monitor and support the implementation of the AONB Management Plan. Guided by the statutory Management Plan, the team takes action to conserve and enhance the natural beauty of the area.

1.3.2 The AONB Partnership consist of: Babergh District Council, Country Land and Business Association, The Crown Estate, Defra (Department for Environment, Food and Rural Affairs), East Suffolk Council, Environment Agency Essex County Council Forestry Commission Historic England Ipswich Borough Council National Farmers Union National Trust RSPB (Royal Society for the Protection of Birds) Suffolk ACRE (Action with Communities in Rural England) SALC (Suffolk Association of Local Councils) The Suffolk Coast Ltd Suffolk Coast Acting for Resilience Suffolk Coast & Heaths AONB team Suffolk County Council Suffolk Farming and Wildlife Advisory Group Suffolk Preservation Society Suffolk Wildlife Trust Tendring District Council

1.3.3 SZC Co. is developing separate SoCGs with a number of AONB Partnership's member organisations. However, this SoCG represents the views of the AONB Partnership as a single entity.

Table 1.1: Overview of Matters and Status of Discussions Between the Parties

Ref. ID	Matter	Applicant's Position	AONBP's Position	Status/Next Steps
SCHAONB-1.1	LVIA Methodology and Approach to Assessment	<p>SZC Co. worked closely with the Suffolk Coast and Heaths AONB Partnership in its role as an LVIA consultee (along with Suffolk County Council, East Suffolk Council and Natural England) throughout the iterative design and assessment process to agree the scope and methodologies of the LVIAs undertaken for the assessment of landscape and visual effects arising from the main development site and associated developments.</p> <p>Matters agreed include:</p> <ul style="list-style-type: none"> -the methodology to be used, including assessment terminology regarding sensitivity of receptors, magnitude of effect and significance of effect; -LVIA references, including legislation and policy and landscape and seascape character baseline; -use of receptor groups in the assessment of visual effects; -the location of representative and illustrative viewpoints; and -the selection of viewpoints for the preparation of visualisations and the type of visualisations to be prepared for each of the agreed viewpoints. <p>Full details of consultation undertaken and agreement reached with LVIA consultees is provided in Volume 2, Appendix 13H of the ES (Doc Ref 6.3).</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-1.2	LVIA assessment - Interpretation of provided photographs and visualisations	<p>A summary of the representative viewpoints is contained in Table 13.11 of the LVIA (Doc. Ref. 6.3) and their locations are shown on Figures 13.6A and Figure 13.6B. The representative viewpoint photography is contained in Figures 13.9.01 – 13.9.32. The photographs are annotated and include a description of the existing view and the visual effects during construction and operation. Illustrative viewpoints – which do not contain a description of visual effects – are included within Appendix 13A of the LVIA (Doc. Ref 6.3).</p> <p>For the main development site, visualisations submitted as part of the LVIA, and which were referred to in the assessment of effects, comprise construction phase parameters based photowires; operational phase parameters based photowires at year 1 and year 15; operational phase photomontages at year 1 and year 15; and operational phase night -time photomontages at year 1 and year 15. For the associated development sites, visualisations include photowires of the illustrative proposals.</p> <p>The location and type of visualisation was consulted upon and agreed with the LVIA consultees (ESC, SCC, SCHAONB and NE) as part of consultation on the scope and approach to the LVIAs of the main development site and associated developments.</p> <p>Full details of consultation undertaken and agreement reached with LVIA consultees is provided in Volume 2, Appendix 13H of the ES (Doc Ref 6.3).</p> <p>Additional visualisations relating to the Worker Campus and land off King Georges Avenue, Leiston for the construction phase of the main development site, were prepared at the request of the Planning Inspectorate (Procedural Decision Notice 4) and submitted in January 2021. The approach to the production of these visualisations was agreed with East Suffolk Council and Natural England in accordance with the PINs request.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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SCHAONB-1.3	LVIA assessment – significance of effects on the AONB and its statutory purpose	<p>The assessment of effects presented in the LVIA fully acknowledges the nature, extent and significance of effects during construction and operation on the AONB informed by a full appreciation of the AONB's natural beauty and special qualities.</p> <p>The statutory purpose of the AONB designation is to conserve and enhance the natural beauty of the area.</p> <p>It follows that the assessment of effects of the Sizewell C project on the Suffolk Coast and Heaths AONB should therefore consider the characteristics, elements and features that contribute to its natural beauty.</p> <p>In the absence of a comprehensive description of the natural beauty of the SCHAONB at the time of progressing the LVIA for Sizewell C, SZC Co., in discussions with the Suffolk Coast and Heaths AONB Partnership, Suffolk County Council East Suffolk Council, documented what constitutes the natural beauty and special qualities of the whole of the SCHAONB. This document established an agreed basis for informing the design of the Sizewell C project and assessing the impacts arising from the construction and operation of SZC.</p> <p>The final and agreed version of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators document is presented in Volume 2, Appendix 13C of the ES (Doc. Ref 6.3) and has been published separately by the Suffolk Coast and Heaths AONB Partnership and East Suffolk Council, and is referred to directly in the Suffolk Coast and Heaths Management Plan 2018-2023.</p> <p>The process of documenting the Natural Beauty Indicators draws on factors used by Natural England when assessing a landscape for designation, with additional 'Special Qualities Indicators' included that were judged to be relevant by the consultees. Consideration is also given in the document to the contribution of coastal and offshore areas (including areas within the Suffolk Heritage Coast) to the Natural Beauty and Special Quality Indicators of the SCHAONB.</p> <p>As recorded at paragraph 1.3.13 in the LVIA methodology in Volume 1, Appendix 6I of the ES, the assessment criteria includes consideration of susceptibility and value in determining receptor sensitivity; and consideration of the scale, extent and duration of the effect in determining magnitude.</p> <p>Paragraph 13.4.17 of Volume 2, Chapter 13 states that the susceptibility of the SCHAONB is influenced by the nature of the special qualities and purposes of the designation and/or the valued elements, qualities or characteristics, indicating the degree to which these may be unduly affected by the proposals. Volume 2, Chapter 13 presents an assessment of the susceptibility of each of the natural beauty and special qualities indicators of the SCHAONB and presents a description of the nature of effects and a judgement of the scale and extent of the effects arising during construction and operation.</p> <p>The MDS LVIA also records that the landscape/seascape within the Suffolk Coast and Heaths AONB and the Suffolk Heritage Coast is judged to be of national value. Volume 2, Chapter 13 goes on to summarise the effects on the natural beauty and special qualities indicators of the SCHAONB. Judgements of the overall effects on the SCHAONB arising from construction are presented in paragraphs 13.6.145 – 13.6.150. Judgements of the overall effects on the SCHAONB arising from operation are presented in paragraphs 13.6.316 – 13.6.321.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-1.4	LVIA assessment - cumulative	The EIA Regulations require that the ES includes consideration of cumulative effects. Schedule 4 of the Infrastructure Planning EIA Regulations and Schedule 3 of the Marine Works EIA Regulations, state that the ES should provide a description of: <i>"the cumulation of effects with other existing and/or approved</i>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		<p><i>projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources”.</i></p> <p>Accordingly, the ES considers:</p> <p>-‘Inter-relationships’ that occur when the individual environmental effects of the proposed development combine together with one another and lead to significant effects on a single receptor (e.g. air quality and noise impacts occurring on the same receptor).</p> <p>-‘Project-wide effects’ that occur when impacts of the main development site and associated developments combine.</p> <p>-‘Cumulative effects with other projects’ that arise as a result of the proposed development in combination with other projects and/or development plans within the Zone of Influence (Zol) of the proposed development.</p> <p>It is assumed that the potentially cumulative schemes will take place as per the descriptions made publicly available at the time of writing this ES, unless otherwise specified in the technical chapter.</p> <p>A staged process has been followed to assess cumulative impacts with other projects, plans and programmes which includes:</p> <ul style="list-style-type: none"> • Stage 1: establishing a Zone of Influence (Zol) and ‘long list’ of non-Sizewell C projects, plans and programmes. • Stage 2: selecting a short list of projects, plans and programmes for the assessment. • Stage 3: information gathering. • Stage 4: assessment. <p>Volume 10 of the ES (Doc Ref. 6.11) sets out the cumulative and transboundary effects associated with the proposed development.</p> <p>Sizewell A and Sizewell B power stations plus the Galloper and Greater Gabbard substations and high voltage transmission lines, as well as existing offshore wind development, are all considered as part of the existing baseline environment within Volume 2, Chapter 13 of the ES. The landscape and visual effects, as well as effects on the natural beauty indicators and special qualities of the SCHAONB, as a result of the proximity of these existing developments to the main development site are noted where relevant.</p> <p>Section 4.7 of Volume 10 of the ES (Doc Ref. 6.11) considers the potential cumulative landscape and visual effects of the Sizewell C Project with other proposed projects. This includes the East Anglia ONE North Offshore Windfarm and the East Anglia TWO Offshore Windfarm; in particular the onshore elements of these projects. Other proposed projects at a much earlier stage in their development were identified but not assessed in detail due to the level of information available on what the proposals would entail. Those schemes of potential relevance to the SCHAONB were:</p> <ul style="list-style-type: none"> • Nautilus Interconnector. • Eurolink Interconnector. • Greater Gabbard extension. • Galloper Extension offshore windfarm. 		

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SCHAONB-1.5	LVIA – SZC approach to mitigation	<p>NPS EN-1 recognises that <i>"the IPC should not expect the visual impacts associated with a new nuclear power station to be eliminated with mitigation"</i> and that the scope for visual mitigation will be <i>"quite limited"</i> albeit the mitigation should be designed to reduce the visual intrusion of the project <i>"...as far as reasonably practicable"</i>.</p> <p>NPS EN-6 also recognises <i>"the potential for long-term effects on visual amenity"</i>.</p> <p>NPS EN-6 further records that <i>"...the Government has considered the purpose of the AONB, which is of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</i> And <i>"The Appraisal of Sustainability identified 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 given that the site is wholly within the AONB."</i></p> <p>It adds</p> <p><i>"This could have an effect on the purpose of the designation. To further understand these effects and the effectiveness of the mitigating actions proposed by the nominator of the site, further detailed assessment at project level is required – the Appraisal of Sustainability suggests through the provision an integrated landscape, heritage and architectural plan. The potential for remaining effects can best be fully assessed when detailed plans come forward because they depend on a range of factors including the detailed proposals for minimisation and mitigation, the cooling technology proposed and location of transmission infrastructure. However, given the limited scope for mitigation, a level of impact is likely to remain"</i>.</p> <p>In the light of NPS EN-1 and NPS EN-6, reasonable mitigation has been provided. Through development of an integrated plan considering amongst other matters, landscape, heritage and architecture design. In addition, detailed information has been provided as part of the DCO and includes integrated mitigation, a design that defines the cooling technology and location of transmission infrastructure.</p> <p>The design seeks to minimise and mitigate landscape and visual effects and effects on the natural beauty and special qualities of the AONB, and upon landscape character and visual receptors through an iterative assessment and design process and importantly, following the identification and agreement of the AONB's natural beauty and special qualities with the Suffolk Coast and Heaths AONB Partnership, Suffolk County Council and East Suffolk Council.</p> <p>The proposals provide embedded mitigation as set out in the relevant LVIAs in the ES and the Design and Access Statement (Doc Ref. 8.1), to reduce adverse effects and ensure that the 'behaviour' of the power station in the landscape is aligned with that of the existing A and B station buildings and supports the integration of the power station into the coastal landscape.</p> <p>Design mitigation measures include:</p> <ul style="list-style-type: none"> -minimising land take for the main nuclear platform; - retention of existing screening features, including landform and vegetation; -factoring in the 'rurality of the area' into the design of subsidiary structures and in addressing light spill; -axial alignment of built structures in relation to the A and B stations; -the simplification of built forms and work to identify appropriate colour and finishes; 	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		<p>-careful architectural design of the proposed turbine halls (including selection of materials and colour) and operational service centre;</p> <p>-careful design of proposed sea defences as naturalistic features similar to those on the coast in the immediate area;</p> <p>-removal of substantial elements of the temporary beach landing facility during the operational phase when the facility is not in use.</p> <p>-reduction in width of the main access road post-construction and the profiling of surrounding landscape to create naturalistic landforms covered with Sandlings grassland and pockets of mixed scrub, heath and stands of trees.</p> <p>-integration of the SSSI crossing into the local landscape and screening / filtering of views to moving vehicles.</p> <p>- the removal of the Outage Car Park within Pillbox Field and associated access from the Sizewell Gap road</p> <p>There are limits to what can be done to mitigate adverse landscape and visual effects, but where flexibility does exist in the EPR design, opportunities to secure a responsive design have been maximised and SZC Co. has sought to embed as much mitigation in their proposals as reasonably practicable and commit to this through detail design information which forms part of the DCO submission.</p>		
SCHAONB-1.6	Good design/ application of design principles	<p>NPS EN-1 refers to 'principles of good design'.</p> <p>The project's design principles have been developed as part of the design process reflecting good practice promoted by organisations including the NIC and secure design governance to support the delivery of good design. With regard to the extent of commitment to detail, SZC Co. has submitted proposals that provide a clear indication of the extent of detailed and parameter based information for approval with significant detail provided for the main power station elements in particular.</p> <p>A clear set of design principles has been submitted for approval and was agreed with stakeholders to inform any subsequent requirements discharge or scheme alteration that may be necessary in future.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-1.7	SZC Illustrative Landscape masterplan and Outline Landscape and Ecology Management Plan	<p>SZC Co. has set out an ambitious vision for the future of the area affected during construction. The estate-wide illustrative landscape masterplan and OLEMP contributes to the mitigation of the effects of the main development site and also enhances the local landscape in regard to its character, ecology and amenity.</p> <p>The vision for the landscape is sound and is founded on the concept of establishing the Suffolk Coast and Heaths AONB landscape in microcosm by creating a mosaic of some of its most valued landscapes such as extensive Suffolk Sandlings, areas of farmland, mixed woodland, coastal dunes and shingle ridges, as well as an appropriate landscape setting for the existing and proposed power station structures. The design also seeks to reflect a subtle transition from the organised farmland landscape to the west to the more open, expansive and natural coastline and adjacent seascape. The vision also responds to the principles for the management of the Sizewell Estate set out by the JLAG (January 2014).</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		<p>The illustrative landscape masterplan presents a compelling future vision for the Sizewell Estate that does not simply re-establish/restore the current landscape of arable farmland and plantations, but seeks to create a mosaic of locally rare and threatened characteristic landscape types that will significantly enhance the ecological, landscape and amenity value of the area, complementing the landscapes to the north at Minsmere and south of the Sizewell Gap.</p> <p>In response to engagement in 2019, the Design Council commented on the proposals and stated that "The design ambition for the landscape and its ecological stewardship is exemplary. The landscape character analysis across the masterplan and local area, and appreciation of the ecological merits and opportunities for enhancement is well demonstrated in the current proposal. This has resulted in a coherent design narrative and approach that factors in long-term landscape enhancements with short-term requirements for construction".</p>		
SCHAONB-1.8	LVIA – SZC mitigation of residual landscape and visual effects/effects on the SCHAONB	<p>The landscape and visual effects identified cannot be fully mitigated in all cases and Volume 2, Chapter 13 documents the nature and extent of residual adverse effects.</p> <p>The scope of the S106 will mitigate the residual effects to the SCHAONB, landscape character and visual amenity within and outside the SCHAONB, and deliver general improvements and enhancements to the area.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-1.9	The effects of temporary and permanent lighting on the landscape and visual amenity.	<p>Temporary and permanent lighting is an issue that has the potential to significantly impact landscape and visual amenity, tranquillity, and dark skies.</p> <p>Drawing on the proposed lighting design for each of the associated development sites and material presented in the Lighting Management Plan for the main development site, the LVIAs for the main development site and associated developments consider the effects of lighting on landscape character, visual receptors and protected landscapes including the SCHAONB where relevant. The main development site is the only aspect of the SZC Project assessed as having the potential to have significant adverse effects on the SCHAONB. The judgements, including the extent of adverse significant effects night-time effects, are presented in Volume 2, Appendix 13B of the ES.</p> <p>Appendix 2B of the Environmental Statement (Doc Ref 6.3) includes a lighting management plan and makes provision for construction and operation lighting.</p> <p>SZC Co. has undertaken night time photography of the Hinkley Point C construction site to act as suitable proxy to illustrate the visual characteristics of activity and plant that can reasonably be expected to be seen at the SZC main development site during night time conditions at a similar point in the construction phasing from locations at various distances from the construction site. The photographs were presented to Suffolk County Council, East Suffolk Council and the Suffolk Coast and Heaths AONB on 26 March 2021, with a draft report circulated 09 April 2021, and are helpful, informing the appreciation of and confirmation of effects recorded in the ES.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.1	Statutory purpose of the AONB	<p>SZC Co. note the AONB Partnership's support for the AONB natural beauty and special qualities indicators work and also note the agreement reached on those matters.</p> <p>The Suffolk Coast and Heaths AONB natural beauty and special qualities indicators document has been produced in agreement with the AONB Partnership, SCC and ESC and has been used to assess the effects of the project on the AONB and inform the design. The assessment is provided in the ES (Doc Ref 6.3) and the significance of effects are identified. Applying EIA assessment language, residual adverse effects are identified and harm to the Special Qualities and Natural Beauty has been assessed.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		<p>SZC Co. note that the AONB Partnership will provide further thoughts on the acknowledged impacts on the defined natural beauty and special qualities of the AONB during written representations.</p> <p>SZC Co. has sought to address and respond to the comments and concerns of the AONB Partnership throughout the design, assessment and application process along with other stakeholders.</p>		
SCHAONB-2.2	Statutory purpose of the AONB	<p>SZC Co. note the AONB Partnership's concern regarding the approach to the assessment of impacts of the project on the AONB and its statutory purpose as a whole. It is noted that the effects on the AONB arising from construction are temporary and reversible (Doc Ref 6.3) and in landscape and visual terms have a physical and visual limit of extent.</p> <p>SZC Co. acknowledges that the project will affect the immediate AONB during construction and operation and describes the relatively limited geographic area over which effects, including those considered to be significant, would be experienced as recorded in the LVIA (Doc Ref 6.3).</p> <p>SZC Co. has put in place mitigation measures where possible and practicable to mitigate and minimise the residual effects.</p> <p>SZC Co. do not agree that the construction phase would cut the designated area in two and has sought to minimise the extent of the proposed development within the AONB. Mitigation measures have included retention of existing vegetation and have looked to mitigate effects as far as reasonably practicable. SZC Co. would also reiterate that effects would be temporary and reversible.</p> <p>SZC Co. do not agree that the effect of the power station during operation, would compromise the designated area as a whole. SZC Co. note that nuclear infrastructure has been a feature of the AONB since its designation with SZA being in place before the AONB itself was formally designated. As such energy infrastructure has and will continue to be, a feature of this part of the AONB but not be 'overwhelmed' by it with the wider countryside dominating the area and prevailing.</p> <p>Whilst significant effects are identified, the AONB will continue to perform its statutory purpose as part of a larger designated area and is reinforced by the wider landscape immediately outside the AONB that remains intact, 'buffering' the AONB. It is noted and in initial exchanges with the AONB Partnership, that it is not possible to distinguish where the boundary of the AONB lies.</p> <p>The term 'AONBs general countryside characteristics' is 'shorthand' for the intrinsic landscape and visual characteristics of the AONB, the effects on which are recorded in the LVIA and have informed the assessment of effects on the natural beauty and special qualities of the AONB.</p> <p>SZC Co. does not agree with the AONBP's comment that the proposed link road (accessing the site) would permanently split the AONB in two and negatively impact the setting of the AONB. The design of the operational road and surrounding landscape assimilates the proposed access into an enhanced Sandlings landscape across the restored construction area, as part of the wider estate masterplan and would be similar in appearance/character as existing roads extending throughout the AONB.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.3	Assessment of the AONB	<p>The LVIA (Doc Ref 6.3) presents an assessment of the effects of the Suffolk Heritage Coast during construction and operation. The purposes of the Heritage Coast are identified separately to those of the AONB, and judgements are made in relation to effects on the Heritage Coast as a separate designation to the AONB.</p> <p>SZC Co. recognise the national status and statutory purpose of the AONB which has been a significant</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		driver in the project design process and is recorded in the design principles that have governed the design. SZC Co. notes that the natural beauty and special qualities indicators of the AONB includes references to the contribution of the coast and offshore areas recognising the close relationship between the designated AONB and area defined as the Suffolk Heritage Coast.		
SCHAONB-2.4	Assessment of Effects	SZC Co. note that the AONB does not concur with the conclusion regarding the effects of the SZB Relocated facilities project.	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.5	Assessment of Effects	<p>SZC CO. has provided embedded mitigation as set out in Volume 2, Chapter 13 of the ES and in the Design and Access Statement (Doc Ref. 8.1), to reduce adverse effects and ensure that the 'behaviour' of the power station in the AONB is aligned with that of the existing SZA and SZB power stations and support the integration of the SZC power station into the coastal landscape including:</p> <ul style="list-style-type: none"> o Careful design of proposed turbine halls, including consideration of colour and materials with reference to an environmental colour study o Careful design of proposed sea defences as naturalistic dune features similar to those on the coast in the immediate area o Retention of existing woodland areas surrounding the site to secure screening of the proposal in the wider landscape <p>The proposals include provision of screening of a substantial amount of lower level development on the main nuclear island reducing visual effects and that are sympathetic to the character of the coastline, combined with a focus on the design and appearance of turbine halls as the primary structures that respond to the existing SZA and SZB power stations along a common alignment.</p> <p>The significance of effects is recorded in Volume 2, Chapter 13 of the ES. SZC Co. consider the effects to have been controlled to the extent that is reasonably practicable and aligned with NPS-EN1 and NPS-EN6.</p> <p>The Design Council was consulted (not employed) on two specific occasions over the course of developing the proposals. A summary of the scope and outcomes of the consultation are presented in section 4.8 of the DAS (Doc. ref. 8.1). The Design Council focussed on the operational main development site, as well as the accommodation campus and the landscape masterplan. Presentation materials and the correspondence from the Design Council related to the two consultations are presented in Appendix B of the DAS. The Design Council visited the site on both occasions and were fully aware of the AONB designation.</p> <p>SZC Co. do not agree with the AONBP regarding the focus of the Design Council response ('work'). Explicit comment was made in relation to the landscape strategy and response which was considered to be exemplary.</p> <p>SZC Co. note that the AONB Partnership does not concur with the findings of the Design Council.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.6	Cumulative Effects	<p>SZC Co. has considered the existing built context provided by Sizewell A and Sizewell B in its planning and design of Sizewell C. Regarding the impact of SZC on SZB in views from the north and Coastguard Cottages (including the impact on the effectiveness of SZB embedded mitigation /design) altering how its perceived, SZC Co. acknowledge that the present context of SZB will alter with the proposed development and as a result will be viewed in a different context, especially from the north.</p> <p>While SZB's appearance in views along the coast will alter, it will remain visible, sitting in a sequence of</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		<p>three periods of nuclear power generation. The design principles described in the Design and Access Statement (Doc Ref. 8.1) identify the importance of securing the alignment of each power station's major structures on a common axis to allow each to be read as separate objects without distorting their legibility through changes in orientation. This design discipline will be apparent in views along the coast from the north.</p> <p>SZC Co. has sought to optimise the land used within the main development site required for operation and minimise disturbance where possible and practicable, minimising the extent of the expansion of the existing nuclear complex.</p> <p>Section 4.7 of Volume 10 of the ES (Doc Ref. 6.11) considers the potential cumulative landscape and visual effects of the Sizewell C Project with other proposed projects, utilising the methodology determined for the DCO as a whole. The list of schemes included within the assessment was agreed with ESC in advance of the assessment. This includes the East Anglia ONE North Offshore Windfarm and the East Anglia TWO Offshore Windfarm; in particular the onshore elements of these projects. Other proposed projects at a much earlier stage in their development were identified but not assessed in detail due to the level of information available on what the proposals would entail. Those schemes of potential relevance to the SCHAONB were:</p> <ul style="list-style-type: none"> • Nautilus Interconnector. • Eurolink Interconnector. • Greater Gabbard extension. • Galloper Extension offshore windfarm. <p>SZC Co. continue to monitor the progress of other proposed projects with potential to result in cumulative effects with the Sizewell C Project. Where further detail becomes available on any of these proposed Projects, SZC Co. Intend to provide an update to the cumulative assessment in advance of Examination.</p>		
SCHAONB-2.7	Alternatives	<p>SZC Co. acknowledges the Ofgem scheme, and the benefits of undergrounding overhead transmission infrastructure in designated landscapes. SZC Co. recognises that the proposed overhead transmission infrastructure will have adverse landscape and visual effects. However, SZC Co. has provided information on the options and associated feasibility study to justify the final proposals and reasoning. SZC Co.'s landscape advisors have been involved in the feasibility study and whilst acknowledging that a below ground option is preferable from a landscape and design perspective, the feasibility of delivering below ground connection is considered to be impractical from an engineering perspective owing to the very constrained nature of the site. The pylon feasibility report has been the subject of a number of stakeholder sessions where the project engineering team have outlined the reasoning for overhead transmission and the option selection process and provided additional evidence for the reasoning. Reference is made to the justification of the pylon options in Section 7 of the DAS (Doc Ref. 8.1), the Consultation Report (Doc Ref. 5.1), and Appendix A of the Planning Statement (Doc Ref. 8.4). SZC Co. note that its landscape advisors (LDA Design) advised on the best above ground option which has been selected.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.8	Tourism	<p>SZC Co.'s position is that while the Ipsos MORI and DMO surveys provide helpful context for the sensitivities that potential and returning visitors may have to change, and therefore can inform the types of activities a Tourism Fund should address, ex-ante stated preference perception surveys cannot be used as a means of estimating quantitative changes in visitor behaviour or economic cost (reported changes in propensity to visit and spend aren't uniform). Showing people images of HPC and then asking how it might affect their holiday choices in Suffolk in five or seven years time is not reliable and cannot be used to quantify actual changes in visitor behaviour; noting this is a general survey point, not</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		<p>just the DMO/Ipsos MORI surveys. Evidence from HPC provides strong support for the gap between ex-ante survey and reality.</p> <p>SZC Co. has shared a proposed approach to the Tourism Fund (including its release, scope, implementation (including Tourism Programme Manager Role) and governance (including via a SERG sub-group)). We understand that these matters are largely agreed, with the outstanding point relating to the scale and timing of payments of the fund still to be discussed and agreed.</p>		
SCHAONB-2.9	Construction Programme	<p>SZC Co. note that the underrepresentation of impacts identified by the AONBP relates to the duration of the effects, not their significance.</p> <p>Construction of the Sizewell C nuclear power station is estimated to take 9–12 years. This has been informed by the experience in delivering projects of this type and scale across the world.</p> <p>The EPR design is now successfully operating at Taishan 1 and 2 in China. The French (Flamanville) and Finnish (Olkiluoto) projects experienced delays as a result of an incomplete design. In the case of Olkiluoto, this was not agreed with the regulator until well after construction started. Both projects also faced quality issues arising from restarting new nuclear build after a long gap. Flamanville has had a delay in order to ensure the recommendations of the French regulator are met..</p> <p>Sizewell C will benefit from direct experience gained from Hinkley Point C construction. The Project has a stable design and will have an experienced workforce and supply chain and a well-tested schedule. SZC Co. have a very good understanding of project risks and how to mitigate them. SZC Co. has been able to learn from the experiences of EPR construction and this has informed the construction assumptions set out in the Environmental Statement (ES) (Doc Ref. Book 6).</p> <p>Further details on the anticipated construction timescales for Sizewell C nuclear power station are provided in Volume 2, Chapter 3 of the ES (Doc Ref. 6.3) [APP-184].</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.10	Visualisations	<p>The approach to the production of construction and operation visualisations presented in the LVIA was agreed by LVIA consultees including the AONB.</p> <p>As identified in Table 2.1 further work has been prepared in relation to night-time effects at HPC.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.11	Introduction of development into AONB	The effects of the SSSI crossing have been considered in the LVIA. SZC Co. has sought to minimise the effects of the SSSI crossing structure through consultation and design development balancing effects on the SSSI and landscape and visual receptors and the natural beauty and special qualities indicators of the AONB.	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.12	Introduction of development into AONB	The effects of the SSSI crossing have been considered in the LVIA. SZC Co. has sought to minimise the effects of the structure through consultation and design development balancing effects on the SSSI and landscape and visual receptors and the natural beauty and special qualities indicators of the AONB. Furthermore, proposed change to the crossing is presented in the DCO change application.	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.13	Introduction of development into AONB	The effects of the access road have been considered in the LVIA. SZC Co. has sought to mitigate the permanent effects of the access road by reducing its width and setting it within the restored landscape (post construction) by the creation of undulating naturalistic landforms to ensure that it is integrated in the restored landscape and substantially screened in views from the surrounding landscape. Final detailed design will be in accordance with the agreed Design Principles set out in the Design and Access	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		Statement, and further design consideration and development will be undertaken with the objective of minimising any urbanising elements and reflect the rural character of local roads that pass through Sandlings/heathland occurring locally. Particular consideration will be given to materials, design detailing, relationship to landform, and associated planting. SZC Co. will consult with ESC, SCC and AONB Partnership in developing the detailed design of the permanent access road.		
SCHAONB-2.14	Introduction of development into AONB	<p>The assessment of landscape and visual effects in relation to the stretch of the green rail route located outside the boundary of the main development site is provided in Volume 9, Chapter 6 of the ES (Doc Ref 6.10). This concludes that due to the physical and visual separation of this section of the green rail route from the SCHAONB there would be no potential for effects on the AONB.</p> <p>Within the main development site, the green rail route is considered as part of the assessment of the landscape and visual effects of the main development site as a whole (see Volume 2, Chapter 13 (Doc Ref 6.3)), with reference made to the rail route where pertinent. Consideration is given to the likely effects of the main development site as a whole on the natural beauty indicators and special qualities of the AONB, as well as appropriate mitigation, both during construction and operation.</p> <p>The Description of Development for the green rail route presented in Volume 9, Chapter 2 of the ES (Doc Ref 6.10) sets out that the green rail route would be removed and reinstated once the route is no longer required, and that it is anticipated that this would take place during the final 24 months of the Sizewell C Project construction programme.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.15	Night-time assessment	<p>The assessment of night time effects arising from the construction and operation of Sizewell C is presented as an appendix to the LVIA (Doc Ref 6.3, Appendix 13B). The LVIA includes an assessment of the effects of artificial lighting on the Suffolk Coast and Heaths AONB.</p> <p>Sizewell A and Sizewell B are features of the baseline environment and as such have been included within the assessment of night time effects presented in the night time appraisal set out in the LVIA (Doc Ref 6.3 Appendix 13B).</p> <p>Note: SZC Co. request clarity from the AONBP in terms of comments regarding an appropriate assessment and why they do not consider the SZA and B should not be part of the baseline.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.16	Outage Car Park	<p>SZC Co. have included an option for revised proposals for the relocated facilities elements of the DCO within the DCO Change submission (Jan 2021), which, if progressed, removes the need for the outage car park development in Pillbox Field. Pillbox Field is only proposed for mitigation planting under this scenario and therefore SZC. Co would reduce development in the AONB as requested by stakeholders under this scenario.</p> <p>There remains disagreement, in respect of SZC Co's operational need to have outage car parking located close to the SZC power station operational platform on Goose Hill.</p> <p>The outage car park would form an extension to the proposed operational car park, rather than being standalone. The effects of the outage car parking provision on the environment and the landscape, including the natural beauty and special qualities of the Suffolk Coast and Heaths AONB, would not be materially different than would result from the proposed operational car park in isolation in this location. This would therefore represent a reduction to the effect potential effect of having a separate outage car park within the AONB.</p> <p>Adverse landscape and visual effects of the Goose Hill car park as a whole are moderated be being</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		surrounded by existing and proposed woodland planting that responds to the local landscape context and provide screening to proposed infrastructure, buildings, lighting and vehicles in this area. Further planting is proposed within the car park area, to break up the volume of car parking into smaller parking areas to provide a more attractive setting and contribute to the overall wooded character of this area of the operational site.		
SCHAONB-2.17	Impacts on PRoW	<p>Effects on users of recreational resources including Public Rights of Way and Open Access areas are assessed in Volume 2 Chapter 15 of the ES (APP-267). Mitigation measures are summarised at section 15.5 of Volume 2 Chapter 15 of the ES.</p> <p>Effects on the England Coast Path and Suffolk Coast Path have been assessed together, using the highest value category of this amenity resource in recognition of the status of the proposed National Trail and the fact that they both run through the Suffolk Coast and Heaths AONB. The England Coast Path has been assessed of high value at paragraph 15.6.6 of Volume 2, Chapter 15 (Doc Ref 6.3), recognising that it will be a National Trail and run through the Suffolk Coast and Heaths AONB. The effects on the perception of tranquillity of users of the proposed England Coast Path are acknowledged and assessed at paragraphs 15.9.192 and 15.6.193 of Volume 2, Chapter 15 (Book 6).</p> <p>Further detailed design work, which has been carried out since the submission of the application, has identified measures which would enable the Coast Path to remain open during construction of the permanent BLF, except in rare circumstances where it is considered unsafe to do so. It would, therefore, now be assumed to remain open for substantially more of the construction period than in the submitted application. An assessment of this change for users of the Coast Path is provided within the Volume 1, Chapter 2 of the ES Addendum (Doc Ref. 6.14).</p> <p>Further detailed design work since the submission of the Application has also identified measures which would enable the Coast Path to remain open at all times during the operation of the permanent BLF. This is an improvement to the proposals presented in the Application which stated that closure of the Coast Path would be unavoidable at times due to the sea-borne delivery of exceptionally large and heavy materials. Please can the AONBP confirm whether the proposed changes now resolve their concerns in relation to this matter.</p>	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.18	Introduction of Development into the AONB setting	The accommodation campus would be located adjacent to the AONB, albeit that the adjacent area of AONB would form part of the main development site construction area during the time of its use. The effects of the accommodation campus have been considered in the main development site LVIA, as part of the overall assessment. Measures to mitigate the effects of the accommodation campus include massing of proposed buildings and organisation of open areas and roadside planting along Eastbridge Road to provide eye level screening. The siting of the sports facilities in Leiston minimises impacts on the landscape adjoining the campus to the west and north. An assessment of alternative locations for the campus is presented within the alternatives and design evolution chapter found within Volume 2, Chapter 6 of the ES (Doc Ref 6.3). Any specific comments from the AONBP on this matter would be welcome.	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing
SCHAONB-2.19	Statutory purpose of the AONB and Assessment of Effects	The location of the Sizewell C nominated site within the Suffolk coast and Heaths AONB and Suffolk Heritage Coast has been an important consideration throughout the design of the main development site and has sought to minimise and mitigate landscape and visual effects and effects on the natural beauty and special qualities of the AONB through an iterative design process and application of agreed design principles.	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing

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		<p>SZC Co. has provided embedded mitigation as set out in Volume 2, Chapter 13 of the ES and the Design and Access Statement (Doc Ref. 8.1), to reduce adverse effects and ensure that the 'behaviour' of the power station in the landscape is aligned with that of the existing A and B power stations and support the integration of the power station into the coastal landscape including: (i) careful design of proposed turbine halls; (ii) careful design of proposed sea defences as naturalistic dune features similar to those on the coast in the immediate area; (iii) removal of substantial elements of the temporary beach landing facility during the operational phase when the facility is not in use.</p> <p>The proposals include provision of screening of a substantial amount of lower level development on the main nuclear island reducing visual effects and are sympathetic to the character of the coastline, combined with a focus on the design and appearance of turbine halls as the primary structures that respond to the existing A and B stations along a common alignment. The significance of effects is recorded in (Volume 2, Chapter 13 of the ES). SZC Co. consider the effects to have been controlled to the extent that is reasonably practicable and aligned with NPS EN1 and EN6.</p> <p>Effects on the England Coast Path and Suffolk Coast Path have been assessed together, using the highest value category of this amenity resource in recognition of the status of the proposed National Trail and the fact that they both run through the Suffolk Coast and Heaths AONB. The England Coast Path has been assessed of high value at paragraph 15.6.6 of Volume 2, Chapter 15 (Doc Ref 6.3) recognising that it will be a National Trail and run through the Suffolk Coast and Heaths AONB. The effects on the perception of tranquillity of users of the proposed England Coast Path are acknowledged and assessed at paragraphs 15.9.192 and 15.6.193 of Volume 2, Chapter 15 (Book 6). Note: SZC Co. would welcome detailed comments from the AONBP in order to specify the matters outstanding between parties.</p> <p>SZC Co. confirm that the proposed soil and sand profiles for the sea defences will adhere to underlying rock armour and that specialist advice has been sought in relation to how the profile is built up. SZC Co. will commit to a management plan to monitor and protect the soft and hard coastal defences to maintain the character of the area. Ongoing management responsibility will be carried out by the Shoreline Management Group.</p>		
SCHAONB-2.19	Mitigation	Schedule 11 of the Section 106 Agreement – Discussions are ongoing	Not yet agreed. Discussions ongoing between AONB staff and applicant prior to seeking AONBP agreement	Discussions ongoing: The parties are working to a deadline of mid-June to agree the scope and wording of the obligation, with discussions to follow in relation to the scale of the fund, with the aim of each party coming to its own position by Deadline 6 (3 September)