

Summary of Suffolk Coast & Heaths AONB Partnership (20025669) verbal representations at Issue Specific Hearing 5

The AONB Partnership is made up of around 25 organisations, many of whom will have made their own representations during the examination process to reflect their statutory duties or purpose. The AONB Partnership seeks to reflect its position as the only grouping that has the sole purpose to champion the purpose of the AONB.

The AONB Partnership responses to the proposals have been drawn from the AONB staff team, the expertise of its partners (both statutory bodies and those with charitable purposes), expertise provided by consultants and expertise drawn from a national network of AONBs and National Parks.

The AONB Partnership sought to make comment on the following agenda items:

2. The Suffolk Coast & Heaths AONB
Significant comment on this item and short points on:
3. Landscape and Visual Impact Assessment-second bullet relating to provision of additional visualisations through the construction phase
4. Role of Design Champion, Design Review panel and Design Code
5. Outage Car Park location and Pylons
6. Main Development site design considerations: bullets:
 - a. Design and scale of turbine halls, operational service centre and skybridges
 - b. Colour considerations
 - c. Proposed design of Sizewell C power station and effect on 'iconic' status of Sizewell B power station
 - d. Design and location of beach landing facilities and additional suggested requirement
 - e. Location of accommodation campus, additional design commitments and requirement

2. The Suffolk Coast & Heaths AONB

The impact of proposals on Main Development Site and ability to deliver statutory purpose of AONB, to conserve and enhance natural beauty.

While recognising the National Policy Statements have identified Sizewell as potential nuclear site, the AONB Partnership question whether the authors of those policy statements had in mind proposals of this scale? As the proposals stand this will more than double the size of the nuclear complex at Sizewell.

It is the opinion of the AONB Partnership that the proposals as they stand are for a development that is too big for this location. It is the AONB Partnership's view that the applicant's proposals that will require a significant amount of irreplaceable nationally designated landscape being unable to deliver its statutory purpose and taking a significant amount of a Site of Special Scientific Interest.

The AONB Partnership considers that the views of Natural England should carry great weight in assessing the impacts on the AONB and that issues relating to impacts on the nationally designated landscape should carry great weight in determining the application. Natural England note in its Written Representations that there are fundamental reasons of principle why the project should not be permitted in its current form.

The Local Authorities and the AONB Partnership have clearly articulated those negative impacts and the applicant itself acknowledges the significant adverse effects the proposals will do to the AONB.

The AONB Partnership would wish to bring attention to the following:

- Although the proposals relate to a limited geographical area of the AONB this should not imply that the proposals will not have a negative impact on the AONB as a whole. The position that the AONB as a whole will be damaged is one shared by Natural England in its Written Representations. If consented a significant area of the AONB would be unable to deliver the AONB purpose. Energy infrastructure of this scale is not a factor that contributes to AONB purpose, the conservation and enhancement of natural beauty.
- If consented and built the proposals would sever the AONB in two at its narrowest point during the 9-12 year construction phase. During operation, the proposed new road would divide the AONB into two.
- The development would have significant impact on the AONB defined quality of tranquillity, that includes noise and in the dark skies. The Westleton Common Dark Sky Discovery Site (Orion Class, hosts events) is a few miles from the proposed development site.
- If built, this development would introduce new roads and a bridge, railway, a 500m jetty, a 600 space car park, pylons, thousands of heavy vehicle movements, increased height and prominence of sea defences, lighting and one of Europe's largest construction sites into a nationally designated landscape. None of these elements of the proposals contribute to the delivery of AONB purpose. Furthermore 100s of vessels coming into the setting of the AONB, in an area largely devoid of human activity and a huge accommodation campus built adjacent to the AONB would not contribute to AONB purpose.
- While appreciating that the proposals have been assessed by the applicant and the statutory authorities have given a technical assessment on the impacts of these proposals, it is clear that the defined qualities of the AONB:
 - Landscape quality
 - Scenic Quality
 - Relative Wildness
 - Relative Tranquillity

- Natural Heritage Features

will be significantly damaged. This is acknowledged by both the applicant in its Landscape and Visual Impact Assessment and the Government's advisor on AONBs and landscape, Natural England in its Written Representations.

The construction site will in destroy the perception of a continuous landscape from views from the north and south due the introduction of a to 500m jetty cutting off long views during the day and introducing noise and light detractors to the AONB's defined qualities.

In the operational phase the impacts of the development would negate the embedded mitigation of Sizewell B by interrupting the relatively simple design of the view of Sizewell B from the north and in particular when viewed from the National Trust's asset, coastguard cottages.

Furthermore, the development would shift the character of this part of the AONB from that which currently meets the AONB purpose to one of an energy hub. This effectively removes the ability of this part of the AONB to function as a nationally designated landscape.

Furthermore, the AONB Partnership consider that the proposals will have many similar impacts on the Suffolk Heritage Coast.

Should the proposals secure consent, The AONB Partnership considers that any compensation and mitigation packages should seek to address the impacts on the AONB and draw on the precedent of the section 106 agreement agreed between the developers of Sizewell B Dry Fuel Store and the Local Authorities. There are many similarities between these proposals and the impact of the Sizewell C project in terms of loss of ability of land effected to deliver AONB purpose. The proposals for SZC are many times the magnitude of land being lost to deliver AONB purpose than that of the Dry Fuel Store and would require scaling up.

This summary then seeks to make brief points on other agenda items covered.

3. Landscape and Visual Impact Assessment-second bullet relating to provision of additional visualisations through the construction phase

The AONB Partnership considers that the Landscape and Visual Impact Assessment for the construction phase, due to the changes to the Development Consent Order made in late 2020, is not based on detailed knowledge of the proposals and are therefore of the necessary standard to understand the full impacts of the changes.

4. Role of Design Champion, Design Review panel and Design Code

The AONB Partnership considers that the development of design should be open to wider scrutiny and beyond the opinion of statutory consultees and others that may have been invited to help shape them. AONBs designated by Government 'for the nation', the nation should therefore have a full say on the

design of the proposals that will have a significant impact on them and voices other than statutory bodies should be heard.

5. Outage Car Park location and Pylons

The AONB Partnership considers that the introduction of a car park and pylons into the nationally designated landscape do not contribute to the statutory purpose of the AONBs. The AONB Partnership considers that all bodies that are subject to section 85 of the Countryside and Rights of Way Act 2000 should reflect this when considering the proposals.

6. Main Development site design considerations: bullets:

a. Design and scale of turbine halls, operational service centre and skybridges

The AONB Partnership considers the impacts of the turbine halls, operational service centre and skybridges on the AONB, a nationally designated landscape should be a significant, if not the primary consideration in their design.

b. Colour considerations

The AONB Partnership considers that the work it commissioned on the use and selection of colour in development should have greater weight in decision making when considering colour.

c. Proposed design of Sizewell C power station and effect on 'iconic' status of Sizewell B power station

The AONB Partnership considers that the proposals for the Sizewell C project will significantly impact the carefully considered embedded mitigation of Sizewell B and that the introduction of new pylons will add further to this negative impact. The AONB Partnership notes the recent award of a grant from the Landscape Enhancement Initiative to reduce the impacts of existing overhead power lines could be usurped by the addition of new overhead power lines and pylons.

d. Design and location of beach landing facilities and additional suggested requirement

The AONB Partnership has not seen detailed designs of the proposed beach landing facilities but consider that the introduction of a 500m jetty into the setting of the AONB will bring detractors to the defined qualities of the AONB, such as impacts on tranquillity (noise and light), scenic quality and landscape quality. If developed the proposals will significant new structures and human activity into the AONB.

e. Location of accommodation campus, additional design commitments and requirement

The AONB Partnership consider the accommodation campus will negatively impact the defined qualities of the AONB as it is proposed to build this in the immediate setting of the AONB.

Simon Amstutz, Area of Outstanding Natural Beauty, Manager
For and on behalf of the Suffolk Coast & Heaths AONB Partnership