

APPLICATION BY NNB GENERATION COMPANY (SZC) LIMITED

FOR A DCO GRANTING CONSENT FOR THE SIZEWELL C PROJECT

**SUMMARY OF ORAL SUBMISSIONS
AT THE ISH 5: LANDSCAPE AND VISUAL IMPACT
FOR
TOGETHER AGAINST SIZEWELL C (“TASC”)¹**

IMPACT ON SUFFOLK COAST & HEATHS AONB

Context

1. The Secretary of State is under a statutory duty to have regard to the “purpose of conserving and enhancing the natural beauty” of the AONB by virtue of ss.85(1) and (2)(a) Countryside and Rights of Way Act 2000.²
2. Moreover, as a matter of policy, Secretary of State has explained that “substantial weight” should be afforded to that objective in the NSIP regime.³
3. The AONB designation overlaps with the Heritage Coast.⁴ This non-statutory designation highlights the qualities of the coastline which contribute towards the special qualities of the AONB.⁵ The Applicant acknowledges a significant adverse effect on the Heritage Coast designation.⁶

¹ IP20026424.

² Accordingly, the ExA must have the duty firmly in mind when advising the Secretary of State.

³ EN-6, para.5.9.9.

⁴ APP-220: ES (Vol.2) Ch.13, Fig.13.1.

⁵ REP2-153: Written Representation of Natural England – 2 June 2021, Issue 20, p.47.

⁶ APP-216: ES (Vol.2) Ch.13, para.13.6.154 and 13.6.324.

4. As will be well known to the ExA, Natural England is the government’s statutory advisor on the impact of development proposals in an AONB.⁷ Accordingly, the views of Natural England should carry “great or considerable weight” and their advice on landscape matters should only be departed from for “cogent and compelling reasons”.⁸ Natural England explains that there are “fundamental reasons of principle why the project should not be permitted in its current form”.⁹ We agree.

Construction Effects (Main Site)

5. The Applicant concedes that there would be “significant” adverse effects on the natural beauty indicators and special qualities of the AONB arising from the construction on the main site.¹⁰
6. However, the Applicant says that is tempered due because the “wider countryside especially to the west of the construction area, would continue to support the AONB’s general countryside characteristics”.¹¹ That is plainly wrong for at least three reasons:

- a. **First**, it is wrong to point to land outside the AONB as justification for the loss of land within the AONB. Such land is by definition of lesser quality and significance as it did not merit inclusion within the AONB.
- b. **Second**, and in any event, between the AONB and the “wider countryside ... to the west” is proposed to be a large construction

⁷ Section 6(4)(e) National Parks and Access to the Countryside Act 1949 read with s.84(1) Countryside and Rights of Way Act 2000.

⁸ *Shadwell Estates Ltd v Breckland DC* [2013] EWHC 12 (Admin) *per* Beatson J at [72] and *R (Mynydd y Gwynt Ltd) v SSBEIS* [2018] EWCA Civ 231 *per* Peter Jackson LJ at [8].

⁹ REP2-153: Written Representation – 2 June 2021, p.1.

¹⁰ APP-216: ES (Vol.2) Ch.13, para.13.6.149.

¹¹ *Ibid.*

area and site entrance hub.¹² It cannot rationally be said this area of land to the west of the AONB will continue to function as countryside during the construction period. Accordingly, to the extent that the “general countryside characteristics” of the land to the west could be said to compensate for the loss of land within the AONB, that will not be the case here as the wider countryside will be severed from the AONB by the heavy urban influence of a construction area.

- c. **Third**, the Applicant concedes that further works in the AONB are “likely” after the initial 9-12 year construction period. Before 2046 the maximum crest height of the sea defence is to be increased to 14.2m AOD and by 2090, the maximum crest height of the SSSI crossing is likely to be raised to 10.5 AOD. The Applicant says those works will result in effects equivalent to the construction phase of the development.¹³ Indeed, the Applicant's recent Coastal Design Report admits that the Soft Coastal Design Feature is sacrificial to the sea and is expected to need replenishment by as early as 2053, this involving major construction activity on the Heritage Coast and in the AONB.¹⁴ As the ExA will be aware those initial estimates of heights have been revised upwards¹⁵ with, we say, further consequential impacts beyond those accepted in the ES.

7. Those factors mean the temporary effects on the AONB arising from the construction phase should weigh heavily against the grant of consent.

¹² APP-159: ES Non-Technical Summary, fig.5.4.

¹³ APP-216: ES (Vol.2) Ch.13, para.13.3.41.

¹⁴ REP2-116 para 3.7.5.

¹⁵ REP2-116, Coastal Defences Design Report, para.2.2.3.

Operational Effects (Main Site)

8. The Applicant concedes there would be “significant operational effects” on the AONB during the operational phase.¹⁶

9. Perhaps uniquely, the residual effects of this Project after construction endure on the **most** sensitive effected landscape: the AONB and Heritage Coast. Needless to say, this perverse approach: to reserve the permanent adverse effects to the most important landscape, is contrary to the hierarchy of protection at paragraphs 170-171 NPPF, which requires land of lesser quality to be used before land of the highest protection, such as AONB.

10. The Applicant seeks to temper the importance of the finding of significant adverse effects on the AONB because the effects would occur “over a very limited extent of the designation”.¹⁷ That is wrong both as a matter of principle and on the facts of this proposal:
 - a. **First**, the AONB enjoys the highest statutory and policy protection as a coherent whole. It was designated for its qualities and characteristics as a single unit. Thus, harm to one (not insignificant part) of the AONB, is harm to the whole. Indeed, Natural England have advised that the scheme would “diminish the AONB **as a whole**”.¹⁸

 - b. **Second**, the acknowledged permanent harm to the AONB is in a very narrow and consequentially very sensitive section of the AONB.¹⁹ What is described by Natural England as “a narrow neck”. That narrow section already accommodates the existing Sizewell

¹⁶ APP-216: ES (Vol.2) Ch.13, para.13.6.316.

¹⁷ APP-216: ES (Vol.2) Ch.13, para.13.6.319.

¹⁸ REP2-153: Written Representation – 2 June 2021, Part II Issue 20, p.39.

¹⁹ APP-220: ES (Vol.2) Ch.13, Fig.13.1.

site and the Galloper and Greater Gabbard substations as well as high voltage transmission lines. The Project site boundary cuts entirely across the AONB. Within that site boundary will remain:

- i. The bulk and massing of the main reactor and supporting buildings, combined with the existing development will fundamentally alter the characteristics of this narrow part of the AONB.
 - ii. The highly engineered SSSI crossing, which will serve as a permanent severance of the AONB.
 - iii. The 1,370-space car park, which will result in the loss of 46ha²⁰ of trees at Goose Hill, a County Wildlife Site.²¹
 - iv. Natural England go so far as to say this residual development would mean this part of the AONB would “primarily [be] associated with major energy generation and transmission and not natural beauty” and that the “sizeable” development site would “no longer be able to contribute to the statutory purpose”.²²
- c. **Third**, in no rational sense can the Project be said to fulfil the objectives of the AONB:

- i. The Applicant concedes it will compromise almost every one of the natural beauty and scenic quality indicators of

²⁰ APP-224 ES (Vol.2) Chapter 14, Table 14.11, p.71.

²¹ REP2-036 ES Addendum (Vol.3) Chapter 2, para.2.7.4 (770 day-to-day and 600 for outage).

²² REP2-153: Written Representation – 2 June 2021, Part II Issue 20, p.44.

the AONB.²³ Whilst the Applicant suggests there will be a positive effect on natural heritage, the Terrestrial Ecology Chapter of the ES in fact records adverse effects on the Sizewell Marshes SSSI, within and integral to the AONB.²⁴ Moreover, Natural England still has outstanding concerns with the effect on features within the SSSI, particularly the permanent loss of fen meadow habitat.²⁵

- ii. It will introduce large-scale development into an area described as being visually sensitive to new built development.²⁶
- iii. It will introduce a significant pylon array in an area in which the existing pylons are described as having a “*substantial negative impact ... and distort the sense of scale within the landscape*”.²⁷ Plainly, that would not therefore contribute to the landscape and scenic beauty of the AONB.
- iv. The conversion of land from arable farmland to dry sandlings grassland, together with the other (largely restorative) proposals,²⁸ do not begin to outweigh the substantial residual harm. Even the Applicant cannot bring itself to suggest that would be the case.

11. It follows that the residual effects of the scheme will conflict with the law and policy in the following five ways:

²³ Namely (i) Landscape quality, (ii) Scenic quality, (iii) Relative wildness, (iv) Relative tranquillity and (v) Cultural Heritage; APP-216: ES (Vol.2) Ch.13, Table 13.17, pp.147-148.

²⁴ APP-224: ES (Vol.2) Ch.14, paras.14.7.135, 14.7.158. 14.7.160.

²⁵ REP2-153: Written Representation – 2 June 2021, para.3.21, p.13.

²⁶ APP-216: ES (Vol.2) Ch.13, para.13.4.60.

²⁷ APP-216: ES (Vol.2) Ch.13, para.13.4.47.

²⁸ APP-027: SZC-SZ0701-XX-000-DRW-100141 01 (Proposed Landscape Masterplan – Doc.2.5).

- a. Conflict with s.85 Countryside and Rights of Way Act 2000 as it cannot be said to be **“conserving and enhancing”** the AONB.
- b. Conflict with para.5.9.9. EN-1 because it would not **“conserve the natural beauty of the landscape”**
- c. Conflict with Policy SCLP10.4 Suffolk Coastal Local Plan because it will have a **“significant adverse effect”** on the AONB.
- d. Conflicts with para.170 NPPF because it will neither **“protect and enhance”** valued landscapes.
- e. Conflicts with para.173 NPPF because it would amount to major development but would not be **“compatible with its special character”**.

12. More alarmingly is Natural England’s view that the residual cumulative effects would:

- a. Functionally remove the land of the development site from the AONB; and
- b. Functionally sever the AONB at its narrowest point, effecting both the continuity and extent over which the statutory purpose is delivered.²⁹

13. What that advice is not so subtly saying, is that if the Project were to be consented and implemented, this land would come under pressure to be removed from the AONB altogether on a future boundary review.

14. Such a destructive result reveals that one would struggle to design a Project which caused **more** harm to the landscape.

²⁹ REP2-153: Written Representation – 2 June 2021, Part II Issue 20, p.45.

Relevance of inclusion within EN-6

15. The inclusion of a site at Sizewell in EN-6 should carry limited weight in the determination of this Project for the following reasons:

- a. The size of the site was 117ha³⁰ compared with the present 332ha³¹ (also referred to as 371.7ha³²) proposal.
- b. The site size and cooling requirements was on the basis of a single reactor,³³ compared with the current twin reactor proposal. Whilst EN-6 suggests that in other respects Sizewell was assessed as a twin reactor project, that is not the case when one considers the AoS itself, which reveals Sizewell was assessed on a base case of “at least one” reactor. At no point does it say a twin reactor model was assessed or that the Applicant’s proposal for a twin-reactor project was suitable.³⁴ Moreover, EN-6 indicates that the agreed size of site for a single reactor was between 30-50ha.³⁵ Given the nominated site for Sizewell C was 31ha,³⁶ it is beyond credibility to suggest that a site of that size was envisaged to accommodate two reactors, given the agreed space requirements per reactor.
- c. The construction period was 5 years compared with the proposed 9-12 years.
- d. The assessment expressly excluded consideration of the access road impact, indeed it says: “there is no presumption that development will take place in the area of the access road”.³⁷
- e. The acknowledged harm (which was manifestly less than is now proposed) was only seen as acceptable because it met the

³⁰ EN-6 Annex C, para.C.8.88.

³¹ APP-224, ES (Vol.2) Chapter 14, para.14.11.20.

³² APP-590 Planning Statement, para.2.2.1.

³³ EN-6, para.3.3.1.

³⁴See: AoS Site Report for Sizewell (October 2010) Table 1.2, para.1.19, p.12 and para.2.5.

³⁵ EN-6 Annex C, para.C.8.89.

³⁶ Proposed Nuclear Development at Sizewell: Environmental Scoping Report (British Energy: November 2008) Fig. SX03 (Rev 04). Attached to this note.

³⁷ EN-6 Annex C, para.C.8.69 & C.8.117.

government's objective of deployment before 2025, that is plainly not the case here.³⁸

16. When those considerations are understood, the inclusion within EN-6 provides no real support for the serious and widespread landscape harm caused by this Project.

MAIN DEVELOPMENT SITE DESIGN CONSIDERATIONS

Proposed Design and Effect on Sizewell B

17. TASC do not accept the design of the Project has been successful:

18. **First**, the Applicant accepts it has **not** considered alternative reactor designs. We are told the design "is the same reactor design as is being constructed at Hinkley Point C".³⁹ It cannot therefore be said that the scheme has been landscape-led for this location:

- a. There is no explanation for that beyond that this reactor design has been approved by the Office for Nuclear Regulation. There is no evidence the Applicant has explored alternative designs with the ONR or the comparative costs of adopting a more sympathetic design. It is notable that the ONR has approved (or is considering) a number of alternative designs for deployment in the UK, in addition to EDF's UK UK European Pressure Reactor™, for example:
 - i. AP1000® (Westinghouse).⁴⁰
 - ii. UK Advanced Boiling Water Reactor (Hitachi-GE).⁴¹
 - iii. UK HPR1000 (General Nuclear Systems) (under consideration).⁴²

³⁸ EN-6 Annex C, para. C.8.83.

³⁹ APP-190 ES (Vol.2) Chapter 6, para.6.2.2.

⁴⁰ GDA completed March 2017.

⁴¹ DAC and SoDA December 2017.

⁴² <https://www.onr.org.uk/new-reactors/faq.htm#q5>.

- b. It therefore cannot be said that the project has considered “the extent to which [detrimental impact on the landscape] could be moderated” cf. EN-1, para.5.9.10.

- c. The Applicant responded during the ISH by submitting:
 - i. It had responded to the landscape context, it was not an identical design to Hinkley Point C.
 - ii. There was no worked-up model of an alternative design.
 - iii. It would not be proportionate to require alternative designs to be explored.
 - iv. An alternative would not be a realistic prospect of providing the same infrastructure capacity in the same timescales proposed.

- d. Those submissions were flawed because:
 - i. The Applicant’s own evidence is that the nuclear island and conventional island design are “**identical**”⁴³ to Hinkley Point C.

 - ii. EN-1 para.5.9.10 places the burden on the Applicant to include an assessment of the “extent to which [the landscape harm] can be moderated”. Unlike, the bullet-point above on alternative sites, Section 4.4. is not referenced in the final bullet point.

 - iii. The proportionality of exploring an alternative design is a matter of planning judgment for the ExA. TASC submit that given the reactor design has constrained the design

⁴³ REP2-111, Responds to ExA’s First Written Questions, Appendix 18D, p.3 (electronic p.187).

response of the scheme, it was plainly proportionate to consider the cost of adopting a more sympathetic landscape-led scheme, akin to Sizewell B.

- iv. The EPR reactor was approved for deployment in the UK in December 2012. Once the Applicant had resolved to develop a new power station at this site in the AONB, it could (and we say should) have sought GDA for a landscape-led reactor for the sensitive Sizewell site, so as to comply with the policy regime for designated landscapes in EN-1. It would have had ample time to have sought ONR approval for alternative designs prior to submission of the application for development consent in 2020. Had the Applicant explored alternative designs with the ONR, it would now be in a position to provide the cost/benefit evidence to justify its preferred reactor design to the ExA. Having failed to do that, the ExA simply does not have the evidence to justify the acknowledged harm has been moderated to the maximum extent.

19. **Second**, Mr Jones told the ISH that one of the design lessons learnt from Sizewell B and incorporated into this scheme was a simple design without clutter. However, that design objective has plainly not been achieved because Natural England explain that:

“The additional four pylons and six monopoles will add visual ‘clutter’ and detract from any positive attributes (strong clean lines) the reactor buildings may be able to achieve.”⁴⁴

20. **Third**, there would be a significant and adverse effect on the design solution of Sizewell B, as Natural England say:

⁴⁴ REP2-153: Written Representation – 2 June 2021, Part II Issue 20, p.52.

- a. It would introduce large prominent structures which would be dominant over Sizewell B. That will be particularly evident from Coastguard Cottages.⁴⁵
- b. The Project would introduce far greater massing and spread of industrial development.⁴⁶

SIZEWELL LINK ROAD

21. The link road will form a new permanent 6.8km, 60mph, carriageway running from A12 south of Yoxford to join the B1122. It will take 24 months to build.
22. It will be outside the AONB⁴⁷ but will fall (almost exclusively) within the Ancient Estate Claylands LCT.⁴⁸ A small area would be within the Special Landscape Area.
23. The Applicant accepts the permanent effects would be of a “high magnitude and would result in moderate adverse effects”.⁴⁹
24. That is coupled with the effects of lighting, which are assessed to be of a “high magnitude and a moderate adverse effect”⁵⁰ however, the Applicant suggests that to be not significant “given the relative lack of existing artificial lighting within this LCT”.⁵¹
25. We say that conclusion is perverse. As the Applicant explains:

⁴⁵ See as clearly illustrated at: APP-223: fig.13.10.66.

⁴⁶ REP2-153: Written Representation – 2 June 2021, Part II Issue 20, pp.45-46.

⁴⁷ APP-459, ES (Vol.6) Chapter 6, fig.6.1.

⁴⁸ APP-458, ES (Vol.6) Chapter 6, fig.6B.1

⁴⁹ APP-457, ES (Vol.6) Chapter 6, para.6.6.55.

⁵⁰ APP-457, ES (Vol.6) Chapter 6, para.6.6.57.

⁵¹ Ibid.

“The Sizewell C development site lies within an area of intrinsically dark skies with the only other source of significant lighting in the immediate vicinity being that of the existing Sizewell A and B power stations.”⁵²

And of the LCT generally:

“this LCT is generally relatively dark with little existing light pollution ...”⁵³

26. The External Light Pollution Map shows this to be an area of very low levels of light. ”⁵⁴

27. The link road is said by Natural England to be within the setting of the AONB.⁵⁵

28. As such, policy SCLP6.3 Suffolk Coastal Local Plan is engaged and breached, because it provides that development in the setting of the AONB, development should: “*h) [m]inimises light pollution from artificial light sources and ensures the retention of dark skies*”.

SOUTHERN PARK AND RIDE

29. This development comprises 26.4ha of predominantly agricultural land north-east of Wickham Market. It will take 12-18 months to build.

30. A small part of the development is within the Special Landscape Area, the majority lies within the Plateau Estate Farmlands.⁵⁶ The loss of an open agricultural field to the development is acknowledged to be a moderate adverse effect.⁵⁷

⁵² APP-182, ES (Vol.2) Chapter 2, Appendix 2B, para.1.2.16.

⁵³ APP-458, ES (Vol.6) Chapter 6, Appendix 6B, para.1.4.11

⁵⁴ APP-458, ES (Vol.6) Chapter 6, Appendix 6B, fig.6B.1.

⁵⁵ REP2-153: Written Representation – 2 June 2021, Part II Issue 20, p.53.

⁵⁶ APP-392 ES (Vol.3) Chapter 6, figs.6.1 and 6.3.

⁵⁷ APP-390 ES (Vol.3) Chapter 6, para.6.6.39.

31. The northern part of the site, lies in a dark area, as shown on the External Light Pollution Map.⁵⁸ That is acknowledged to give rise to moderate adverse effects “given the relative lack of existing artificial lighting in the vicinity of the northern part of the site”.⁵⁹
32. That conflicts with policies SCLP6.4 and SCLP10.4 Suffolk Coastal Local Plan, which provides that anywhere across the plan area development should:

“Policy SCLP6.4 ...

f) Minimise[...] light pollution from artificial light sources and ensures the retention of dark skies;”

“Policy SCLP10.4 ...

“... protect and enhance the tranquillity and dark skies across the plan area.”

TWO VILLAGE BYPASS

33. The bypass will comprise a new permanent, 2.4km, 60mph, single carriageway road which will depart from the A12 south-west of Stratford St Andrew before re-joining the A12 east of Farnham. It will take 24-months to build.
34. It will fall outside the AONB but a large section would be within the Special Landscape Area. The road would run through the Rolling Estate Sandlands, Valley Meadowlands and Plateau Estate Farmlands LCTs.⁶⁰

⁵⁸ APP-391, ES (Vol.3) Chapter 6, Appendix 6B, fig.6B.1.

⁵⁹ APP-390 ES (Vol.3) Chapter 6, para.6.6.41.

⁶⁰ APP-424, ES (Vol.5) Chapter 6, fig. 6.3.

35. The assessment is of a permanent:

- a. Moderate-adverse effect on the Rolling Estate Sandlands.⁶¹
- b. Moderate-adverse effect on the Valley Meadowlands.⁶²
- c. Moderate-adverse effect on the Rolling Estate Claylands.⁶³

36. There is again an acknowledged adverse effect arising on all three LCTs from lighting.⁶⁴ This is within an area with very low levels of light, as shown on the External Light Pollution Map.⁶⁵

37. Again, that conflicts with policies SCLP6.4 and SCLP10.4 Suffolk Coastal Local Plan, which provides that anywhere across the plan area development should:

“Policy SCLP6.4 ...

f) Minimise[...] light pollution from artificial light sources and ensures the retention of dark skies;”

“Policy SCLP10.4 ...

“... protect and enhance the tranquillity and dark skies across the plan area.”

38. The policies of the Suffolk Coastal Local Plan are consistent in this respect with paragraph 180(c) NPPF which enjoins decision makers to *“limit the impact of light pollution from artificial light on ... intrinsically dark landscapes ...”*. As such, the conflict should carry significant weight.

⁶¹ APP-421, ES (Vol.5) Chapter 6, para.6.6.59.

⁶² APP-421, ES (Vol.5) Chapter 6, para.6.6.63.

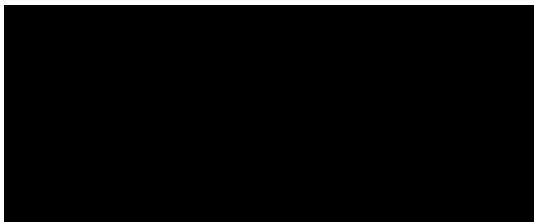
⁶³ APP-421, ES (Vol.5) Chapter 6, para.6.6.67.

⁶⁴ APP-421, ES (Vol.5) Chapter 6, paras.6.6.61, 6.6.65 and 6.6.69.

⁶⁵ APP-422, ES (Vol.5) Chapter 6, Appendix 6B, fig.6B.1.

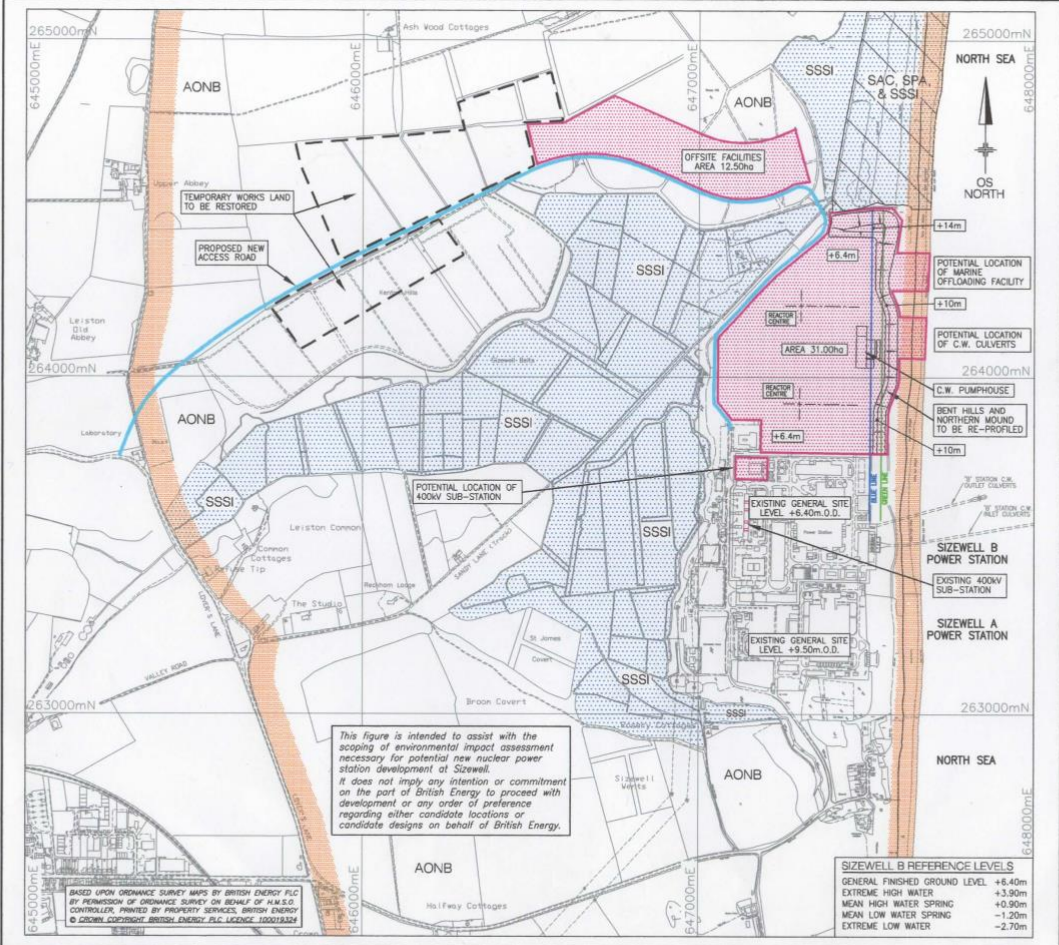
CONCLUSION

39. TASC invite the ExA to find the scheme conflicts with local and national policy as a consequence of the landscape harm, and therefore recommend to the Secretary of State that the landscape effects weigh heavily against the grant of development consent for the Sizewell C Project.

ASHLEY BOWES

20 July 2021.

WARNING 1 This drawing has been produced on AutoCAD. Modifications shall not be carried out by hand.



This figure is intended to assist with the scoping of environmental impact assessment necessary for potential new nuclear power station development at Sizewell. It does not imply any intention or commitment on the part of British Energy to proceed with development or any order of preference regarding either candidate locations or candidate designs on behalf of British Energy.

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KEY

- POTENTIAL EXTENT OF PERMANENT WORKS NEW - NUCLEAR DEVELOPMENT FOOTPRINT
- LIMIT OF OPERATIONAL LAND
- LIMIT OF CW STRUCTURES

STATUTORY DESIGNATIONS

- SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
- SPECIAL AREA OF CONSERVATION (SAC) AND SPECIAL PROTECTION AREA (SPA)
- AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

NOTES

- PERMANENT FOOTPRINT DEVELOPMENT DEPENDANT UPON OFFSITE PROXIMITY REQUIREMENT.
- POTENTIAL LOCATION OF REACTORS, C.W. PUMPHOUSE, & 400KV SUB-STATION REQUIREMENTS FOR POTENTIAL NEW DEVELOPMENT.
- POTENTIAL NEW BUILD SITE LEVELS RAISED TO +6.4m.
- NATIONAL GRID ARE TO CONFIRM EXISTING SIZEWELL A & B 400KV SUB-STATION REQUIREMENTS FOR POTENTIAL NEW DEVELOPMENT.
- MARINE OFFLOADING FACILITY PROVIDED FOR CONSTRUCTION AND POTENTIAL OPERATIONAL USE.
- EXISTING NORTHERN MOUND AND BENT HILLS TO BE RE-PROFILED AS INDICATED.

REFERENCE FIGURES

- SX 01 EXISTING LAND USE PLAN AND POTENTIAL DEVELOPMENT FOOTPRINT
- SX 02 EXISTING SITE AND INDICATIVE DEVELOPMENT FOOTPRINT
- SX 04 EXISTING SMA & SPS MAIN BUILDING PLAN & ELEVATIONS
- SX 05 SMA, SPS & SPS INDICATIVE EAST ELEVATION
- GEN 01 AREVA EPR, GE ESBWR, AP1000, PLAIN LAYOUT
- GEN 02 AREVA EPR, GE ESBWR, AP1000, ELEVATIONS

Scale 1:10,000 @ A3
0 100 500m

Drawn : S Gallimore Date : Sep 08

British Energy

Sizewell Power Station
New Nuclear Development

Indicative Permanent
Development Footprint

Figure SX 03 Rev 04