

IP 20025669

August 2021

## **Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership comment on changes to original application relating to a Desalination Plant for Sizewell C project (Change 19)**

### **Commentary**

The AONB Partnership makes the following comments on the changes to the Sizewell C application for a temporary (up to 12 years during construction) desalination plant, that may be moved between two sites within the nationally designated landscape.

The AONB Partnership are aware of concerns raised earlier by several parties about the availability of a suitable water supply and is disappointed that a new element that could have impacts on the defined qualities of the AONB being proposed at this stage. The AONB Partnership notes the short period for comment.

The changes to the application for a desalination plant indicates to the AONB Partnership that expert advice is not being given due weight by the applicant on what is required to build such a development of this scale at this location. It further demonstrates that the scale of the Sizewell C proposals in this location is not suitable.

The changes would cause additional damage to the nationally designated AONB. The AONB Partnership can see no reference to the AONB in the proposed changes document (AS 397) and considers that the lack of reference to the location of the planned changes to the Sizewell C project, in a nationally designated landscape, to be remiss.

### **Suffolk Coast & Heaths AONB Partnership**

This consultation response is made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership. The Partnership is made up of around 25 organisations which 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 which 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.**

The AONB Partnership's main concerns are summarised below:

- 1) **Time period of consultation**
- 2) **Impact on defined qualities of the AONB**
- 3) **Impact on the statutory purpose of the AONB**
- 4) **Consideration of the AONB**
- 5) **Other AONB issues**

#### **1) Time period of consultation**

The AONB Partnership consider that insufficient time has been available to fully consider the potential impacts on the AONB given that the changes have come during the examination

period. For membership organisations such as the AONB Partnership, the ability to develop an informed response calling on the expertise of a wide range of partners, is compromised by the restriction on time available. The AONB Partnership considers if such an application was made for a standalone facility it would be considered major development.

## 2) Impact on the defined qualities of the AONB

The Suffolk Coast & Heaths AONB's natural beauty is defined by a series of features as agreed between the applicant, Suffolk Coastal District Council (now East Suffolk Council), Suffolk County Council and the AONB Partnership. These defined features are outlined in the *Natural Beauty and Special Qualities Indicators v1.8*<sup>1</sup>

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*<sup>2</sup> and include the following characteristics:

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

The AONB Partnership consider that the changes to the Sizewell C project:

- 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 are an incongruous feature.
- Do not contribute to **scenic quality** by providing a distinctive sense of place, (as they introduce a built element into the AONB that does not contribute to the local vernacular.
- Do not contribute to **relative wildness** including a sense of remoteness, due the introduction of an industrial element during construction phase of up to 12 years.
- Do not contribute to **relative tranquillity** by the introduction of increased vehicle movements and noise of generators 24 hours a day for 7 days per week for up to 12 years.
- Do not contribute to the conservation or enhancement of **natural heritage features**
- Do not contribute to **cultural heritage** of the AONB due to the introduction of large building (10 m high)

## 3) Impact on statutory purpose of the AONB

The statutory purpose of an AONB is to conserve and enhance natural beauty. The AONB Partnership does not consider that this proposed development would contribute to the statutory purpose of the AONB.

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<sup>1</sup> 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-Heath.pdf>

<sup>2</sup> Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England [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](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)

#### **4) Consideration of the AONB**

The AONB Partnership are disappointed in that it can see no reference to the nationally designated AONB in AS397 in the applicants document: *Third Notification of Proposed Project Changes* or an indication of an assessment of the impact on the AONB of the proposed changes on the nationally designated landscape.

#### **5) Other AONB issues**

The AONB Partnership considers that:

- The use of a desalination plant is not an efficient use of resources and that the use of diesel generators to power the plant is unsustainable. The changes, would have a negative impact on local air quality and the defined tranquillity of the AONB. The National Policy Statement EN-1 notes the nuclear industries role to diversify and decarbonise sources of electricity, the use of diesel generators for a period of up to 12 years would not appear compatible with this.
- The stated possibility of moving the desalination plant to a location away from the original proposed location to a position on higher ground would not contribute to AONB purpose. The desalination plant in either location will not contribute to the purpose of the AONB.
- The change will require an increase in HGV movements for the delivery of plant. Furthermore a previous consultation document produced by the applicant notes that a water supply for 9-12 months, while the desalination plant is constructed (up to 40 deliveries per day, requiring 80 movements per day), will be by lorry. It is acknowledged that this would be within the capped HGV limits but these changes, if implemented would lead to an increase in HGV movements in the AONB, and therefore not contribute to its statutory purpose.
- If the applicant pursues an alternative strategy to bring in water supplies by sea, that would impact the AONB. An assessment of relative impacts would be required to understand how any such alternative changes would affect the nationally designated landscape.
- The introduction of diesel generators to power the proposed desalination plant would impact the defined qualities of tranquillity of the AONB.

**The AONB Partnership consider the defined qualities of the AONB would be negatively impacted by the changes and the creation of a desalination plant. This re-enforces the view that the overall proposals for the Sizewell C project are too large for this location and would have a significant detrimental effect on the AONB.**

Simon Amstutz

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