

IP 20025669

September 2021

**Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) staff team comment on proposed revisions to the National Policy Statements in relation to Examining Authority assessing proposals for the Sizewell C Project.**

For the avoidance of any doubt this question is raised by the AONB Manager following discussion on the topic with the AONB Partnership Vice Chair (The role of AONB Partnership Chair is currently vacant).

The current review of the National Policy Statements includes revised wording in the National Policy Statement for Electricity Networks Infrastructure (EN-5) relating to overhead power cables in National Parks and AONBs.

Can the Examining Authority give an indication of whether it will consider the new draft wording when assessing the proposals for the Sizewell C project given that any approved Development Consent Order is likely to require the Sizewell C project to operate under the revised National Policy Statements and perhaps come into force before construction begins?

See

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1015238/en-5-draft-for-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015238/en-5-draft-for-consultation.pdf)

While recognising the consultation states:

*While the review is undertaken, the current suite of NPS (or for nuclear development the position set out in the Written Ministerial Statement of 7 December 2017) remain relevant government policy and EN-1 to 5 have effect for the purposes of the 2008 Act. They continue to provide a proper basis on which applications can be prepared, the Planning Inspectorate can examine, and the Secretary of State can make decisions on, applications for development consent. The Secretary of State has decided that for any application accepted for Examination before designation of the amendments to the NPS, the original suite of NPSs should have effect. The amended NPS will therefore only have effect in relation to those applications for development consent accepted for examination after the designation of those amendments.*

Some may consider that if the revised wording is adopted in the revised National Policy Statements then the AONB would be in the unfortunate position of potentially seeing new overhead lines introduced into the nationally designated landscape when policy indicates a higher bar needs to be reached in order to introduce new overhead lines in the AONB.

The introduction of new overhead power lines into the nationally designated landscape (The Suffolk Coast & Heaths AONB) and has been of great concern to the AONB Partnership and as I understand the local authorities and many members of the local community.

The draft National Policy Statement for Electricity Networks Infrastructure (EN-5) includes the following:

*2.11.6 Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for the infrastructure. **However, in nationally designated landscapes (for instance, National Parks and Areas of Outstanding Natural Beauty) even residual impacts may well make an overhead line proposal unacceptable in planning terms.** (See Section 2.11.13. below for guidance on this case.)*

*2.11.13 Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, Broads, or Area of Outstanding Natural Beauty). **In these areas, and where harm to the landscape cannot feasibly be avoided by mitigation or re-routing, the strong starting presumption will be that the developer should underground the relevant Section of the line.** Note however that undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes is not outweighed by its corresponding landscape and/or visual benefits.*

**My emphasis.**

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cc Nick Collinson. Vice Chair, Suffolk Coast & Heaths AONB Partnership