



The Sizewell C Project

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

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NOT PROTECTIVELY MARKED

SIZEWELL C PROJECT

PINS REF: EN010012

STATEMENT OF COMMON GROUND BETWEEN

(1) NNB GENERATION COMPANY (SZC) LIMITED ('SZC
CO.')

AND

(2) Suffolk Coast & Heaths AONB Partnership ('AONBP')

REVISION: 03

DATE: 12 October 2021

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1. Statement of Common Ground Between SZC Co. and Suffolk Coast & Heaths AONB Partnership ('AONBP')

1.1. 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 has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and shared with the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership (AONBP). Collectively SZC Co. and the AONBP are referred to as 'the parties'. This version should be considered final.

1.1.3. This SoCG has evolved through a programme of engagement and a series of version submitted into the SZC examination at Deadline 2 [REP2-084] and Deadline 5 [REP6-020].

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 or documents submitted to the DCO process by interested parties. 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 discussed between the parties, and presents each parties final position.

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1.3. The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership (AONBP)

- 1.3.1. The AONBP was formed in 1993 and is comprised of organisations with an interest in the AONB. Membership of the Partnership 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 statutory Suffolk Coast & Heaths AONB Management Plan, which is subject to review every 5 years. 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 several local authorities that have part of the nationally designated landscape within their jurisdiction, is hosted by Suffolk County Council, but reports to a Joint Advisory Committee made up of councillors from the local authority funding partners, 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 Mid Suffolk 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 AONBP as a single entity.

Table 1: Overview of Matters and Status of Discussions Between the Parties

Ref. ID	Matter	Applicant's Position	AONBP's Position	Status
AONBP-1.1	LVIA Methodology and Approach to Assessment	<p>SZC Co. worked closely with the Suffolk Coast & Heaths AONB staff team who shared thinking with the AONB Partnership as appropriate in its role as an LVIA consultee (along with Suffolk County Council, East Suffolk Council [formerly Suffolk Coastal District 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>	Agreed	Agreed
AONBP-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</p>	<p>The AONBP agree with the approach undertaken for the LVIA assessment for the original DCO application, however it considers that the subsequent work to assess the landscape and visual impacts deriving from the changes to the DCO in late 2020 on the qualities of the AONB are not adequate.</p> <p>Furthermore, the AONBP, while welcoming the work of adding visualisations relating to the workers campus considers that the potential</p>	<p>SZC Co. note position of the AONBP and has provided a detailed response within the SZC Co. response to the AONBP written representation [REP3-042].</p> <p>Furthermore, SZC Co. considers that the LVIA fully assesses the effects of the accommodation campus.</p>

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		<p>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 Natural England) 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>	<p>impacts of this element of the proposals will have a negative impact on the AONB.</p>	
AONBP-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 & Heath 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 & Heath AONB Partnership, Suffolk County Council East Suffolk Council (formerly known as Suffolk Coastal District Council at the time), 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 & Heath Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators document, version 1.8 dated</p>	<p>The AONBP welcomes the development of the defined Natural Beauty and Special Qualities document, published in 2016.</p> <p>As the AONBP records in its Written Representation it considers that the proposals for Sizewell C do not contribute to AONB purpose or the defined qualities of the AONB, namely landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features or cultural heritage.</p> <p>The AONBP considers that the proposals do not contribute to the statutory purpose of the AONB.</p>	<p>SZC Co. note SCHAONB Partnerships position and has provided a detailed response within the SZC Co. response to the AONBP written representation [REP3-042].</p>

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		<p>21 November 2016, is presented in Volume 2, Appendix 13C of the ES (Doc. Ref 6.3) and has been published separately by the Suffolk Coast & Heaths AONB Partnership and East Suffolk Council, and is referred to directly in the Suffolk Coast & Heaths AONB 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 & 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>		
AONBP-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</i>	The AONBP recognises the approach that the applicant has taken to the consideration of the cumulative landscape and visual impacts of the	SZC Co. note the position of the AONBP and has provided a detailed response within the

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		<p><i>with other existing and/or approved 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</p>	<p>proposed development through the required Environmental Impact Assessment regulations. However, it considers the proposals, if delivered as outlined in the DCO documents would:</p> <ul style="list-style-type: none">• Negate the embedded mitigation of the careful simple design of Sizewell B.• Negate the screening effect of Sizewell A by Sizewell B from viewpoints to the north• Extend the relatively contained nuclear complex by doubling its size. <p>Furthermore, the impacts of the proposals should be considered against the emerging proposals for other energy projects impacting on the AONB including those such as: Nautilus, Eurolink, Greater Gabbard, Galloper/Five Estuaries as well as the existing energy infrastructure that impacts on the AONB.</p> <p>The AONBP consider that emerging proposals should be considered in impact assessments as much is known about the emerging proposals to enable sufficient initial analysis of cumulative impacts and that the applicant should show demonstrate a corporate responsibility to acknowledge that the Sizewell C project is not being built in isolation, even where other significant proposals are behind the applicants planning process.</p>	<p>SZC Co. response to the AONBP written representation [REP3-042].</p>

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		<p>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.		
AONBP-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 & 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"</i></p>	<p>The AONBP recognises the statements in the National Policy Statements for Energy EN1 and Nuclear Power EN6. However, the AONBP considers that many of these statements were written with the scale of the existing Sizewell A and Sizewell B in mind, which are perhaps one fifth and one half of the size of the proposed Sizewell C.</p> <p>The AONBP considers that the applicant has not fully sought to minimise the impact on the AONB through design for the following reasons:</p> <ul style="list-style-type: none">• Replicating the design from Hinkley Point C, demonstrating that the location of the proposals in a nationally designated landscape has not been considered.	<p>SZC Co. considers it has taken all reasonable measures to mitigate the effects of the proposed development. SZC Co. highlights the positive benefits of the estate wide vision and Composite Operational Landscape Masterplan and Estate Wide Management Plan (EWMP) (Doc Ref 9.88(B)/10.15), which will enhance local landscape character, biodiversity amenity and the natural beauty and special qualities of the Suffolk Coast and Heaths AONB, including through the creation</p>

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		<p><i>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 & Heaths AONB Partnership, Suffolk County Council and East Suffolk Council.</p> <p>The proposals provide embedded mitigation as set out in the relevant LVIA's 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;-careful architectural design of the proposed turbine halls (including selection of materials and colour) and operational service centre;	<ul style="list-style-type: none">• In effect building two new power stations as demonstrated by the proposals for two European Pressurised Reactor units.• Introduction of a temporary beach landing facility that will extend light, noise and shipping movements over 500m into the sea which is the setting of the AONB and currently virtually devoid of human activity.• Proposals for the introduction of new overhead power cables rather than undergrounding such cable routes. <p>While the AONBP acknowledges the efforts made to reduce other impacts such as land take for the nuclear platform, retaining some screening features, seeking to minimise the impacts of additional light sources, design of the turbine halls (including use of colour), design of sea defences, removal of temporary beach land facility elements when not in use, considered design of the access road, reprofiling the land, design of the Site of Special Scientific Interest crossing each one of these proposals does not contribute to the statutory purpose of the AONB. The AONBP recognise the need for development in the AONB and the demand for electricity but consider the scale of the proposals as they currently stand cannot be satisfactorily mitigated for in respect of negative impacts on the AONB.</p>	<p>of extensive areas of locally characteristic Sandlings habitat.</p> <p>Furthermore, SZC Co. highlight the role of the Natural Environment Improvement Fund within the Deed of Obligation (Doc Ref 8.17(H)/10.4) in mitigating the residual landscape and visual effects of the proposed development, and potential for widespread enhancement of the natural beauty and special qualities of the SCHAONB and character and resilience of its wider landscape setting.</p>

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		<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>		
AONBP-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>	<p>The AONBP recognise the applicant has developed a set of design principles but consider that many non-statutory stakeholders were not able to influence them or any subsequent requirements. It acknowledges that any further engagement with the community and non-statutory stakeholders is not in the gift of the applicant.</p> <p>The AONBP recognises and welcomes the applicant’s expectation that it would be involved with design discussions going forward through consultation with ESC.</p>	<p>SZC Co. note the position of AONBP and is aware of the AONBPs desire to continue to be involved in the process.</p> <p>As set out in SZC Co.s responses to EXQ3 LI.3.0 [REP8-116], it should be noted that in the updated revision (Rev 02) of the Design and Access Statement [REP5-070] submitted at Deadline 5, the revised wording to Design Principle 56 confirmed that SZC Co will need</p>

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				<p>to obtain approval from ESC for the colour palette and panel profile. By virtue of the pre application by SZC Co. and consultation following submission to ESC, SZC Co. would expect the AONB Partnership and the National Trust to be consulted.</p> <p>In addition, Both Design Principle 57 and 80 as included in the updated revision (rev 02) of the Design and Access Statement [REP5-070], refer to reserved matters applications requiring to be submitted for approval. dDCO Requirement 12, states that these reserved matters applications need to be submitted and approved by ESC, following consultation with the National Trust and the AONBP.</p> <p>Therefore, it is expected that the AONBP would be involved with design discussions going forward through consultation with ESC.</p>
AONBP-1.7	SZC Illustrative Landscape masterplan and Outline	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 AONBP recognise the ambitions of the applicant relating to its own estate for	SZC Co. welcome the AONBPs acknowledgement of its ambitious plans and vision for

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	Landscape and Ecology Management Plan	<p>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-& 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> <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>	<p>enhancements to character, ecology and amenity during the operational phase of the proposals.</p> <p>The AONBP considers that there will be significant negative impacts if the proposal is implemented during the stated 9-12 year construction phase on the AONB’s defined qualities namely: landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features or cultural heritage.</p> <p>Furthermore, the impacts of the proposed development will be felt outside the applicant’s estate during construction and operation, most significantly within the AONB but also further afield.</p> <p>It should be noted that the AONBP is not part of the JLAG, which the AONBP assumes refers to the Joint Local Authority Group.</p> <p>The AONBP notes the view of the Design Council in 2019 but notes that this position was before the changes to the DCO were agreed in 2021. The AONBP questions the view that ecological stewardship is exemplary given the loss of a significant proportion of a Site of Special Scientific Interest, reprofiling of land in a nationally designated landscape and the loss of significant land to be able to deliver the purpose of the AONB designation</p>	<p>the EDF Energy Estate following the end of the construction phase which will deliver landscape, ecology and amenity enhancements.</p> <p>SZC Co. considers that the effects on landscape and visual receptors and the SCHAONB and Suffolk Heritage Coast have been accurately recorded in the Application documents and where significant adverse effects would arise, including in areas outside the EDF Energy Estate.</p> <p>SZC Co. considers it has taken all reasonable measures to mitigate the effects of the proposed development and highlights the role of the estate wide vision and Composite Operational Landscape Masterplan and Estate Wide Management Plan (EWMP) (Doc Ref 9.88(B)/10.15), and the Natural Environment Improvement Fund within the Deed of Obligation (Doc Ref 8.17(H)/10.4) in mitigating the</p>

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				residual effects of the proposed development and delivering localised enhancements to the SCHAONB and its setting (see AONBP-1.5)
AONBP-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 Deed of Obligation 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>	<p>The AONBP agree that the landscape and visual impacts of the proposed development cannot be fully offset and that residual impacts on the AONB and further afield will remain. The AONBP considers that mitigation, in the form of a Deed of Obligation (not section 111) is the best vehicle to deliver mitigation and that the precedent of the Sizewell B Dry Fuel Store is a relevant precedent. The AONBP consider that the precedence of the mitigation fund for the Sizewell B Dry Fuel Store could be a useful indicator for magnitude and operation of any mitigation programme. The AONBP has a public position statement on the operation of the fund.</p> <p>The AONBP consider that some elements of the proposed development cannot contribute to the statutory purpose of the AONB, for example large buildings, and that no amount of compensation can offset those impacts while acknowledging that funds made available for projects inside and outside the AONB can contribute to environmental enhancement. It is noted by the AONBP that funds due to compensate the residual damage to the AONB made available via the Natural Environment Improvement Fund will</p>	SZC Co. agrees that not all effects arising from Sizewell C can be fully mitigated. The landscape and visual impact assessment has identified the nature, extent and scale of residual impacts and highlights the role of the Natural Environment Fund within the Deed of Obligation (Doc Ref 8.17(H)/10.4) in mitigating residual effects and potential for enhancing landscape character across a significant area of the Suffolk Coast and Heaths AONB and its wider setting within the Fund area.

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			be available for projects inside and outside the AONB	
AONBP-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 & Heaths AONB team 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>	<p>The AONBP recognise lighting to be a detractor from the defined AONB quality of tranquillity. Additional lighting arising from any implementation of the proposals will negatively impact the statutory purpose of the AONB.</p> <p>The AONBP recognise the night-time proxy work from Hinkley Point C is helpful in informing the understanding of impacts from lighting from a similar development but note that the proposals for Sizewell C are in a nationally designated landscape and as such should be subject to detailed bespoke assessment and proposals to minimise any negative impacts on the AONB.</p> <p>Furthermore, the AONBP consider that not feel that the new visualisations made available at deadline 8 show craneage as per the wireline diagrams. CGIs are clipped to around the power station rather than across the entire view from Dunwich Coastguard Cottages</p>	<p>SZC Co. welcome the AONBPs comment regarding the Hinkley Point C proxy work</p> <p>Several Interested Parties, including the SCHAONBP have requested SZC Co. provide additional day and night time visualisations of the construction phase. In accordance with the commitment recorded in its response following ISH 5 [REP5-117] SZC Co. has prepared illustrative construction phase visualisations for day and night-time conditions from four representative viewpoint locations all located within the SCHAONB [REP8-326] and [REP8-327]</p> <p>These viewpoint locations were selected to provide an indication of how construction of Sizewell C may appear from the most visited publicly accessible locations from where the visual impacts of the construction phase would be experienced, including from representative viewpoint 17</p>

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				which is located at the National Trust Dunwich Coastguard Cottages. A short technical report has been submitted with the visualisations at Deadline 8 [REP8-119] .
AONBP-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 & Heaths AONB natural beauty and special qualities indicators document has been produced in agreement with the AONB Partnership, SCC and ESC (formerly Suffolk Coastal District Council) 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> <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>	<p>The AONBP has commented on its view on that the proposals will negatively impact the natural beauty and special qualities of the AONB throughout all consultations and been expressed in its Relevant Representations and Written Representations. As acknowledged in the applicant's application documents and the National Policy Statements on energy and nuclear power the proposals will harm the AONB designation and cannot be fully mitigated leading to residual damage.</p>	<p>SZC Co. note the position of the AONBP and has provided a detailed response within the SZC Co. response to the AONBP written representation [REP3-042].</p> <p>SZC Co. considers that the effects on landscape and visual receptors and the SCHAONB and Suffolk Heritage Coast have been accurately recorded in the Application documents and where significant adverse effects would arise, including in areas outside the EDF Energy Estate.</p> <p>SZC Co. considers it has taken all reasonable measures to mitigate the effects of the proposed development and highlights the role of the estate wide vision and Composite Operational Landscape Masterplan and Estate Wide Management Plan (EWMP) (Doc Ref 9.88(B)/10.15), and the</p>

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				Natural Environment Improvement Fund within the Deed of Obligation (Doc Ref 8.17(H)/10.4) in mitigating the residual effects of the proposed development and delivering localised enhancements to the SCHAONBP and its setting (see AONBP-1.5)
AONBP-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>The AONBP recognise that construction is planned for 9-12 years and while this may be defined as temporary it is a significant period of time and would account for around one sixth of the time the AONB has been designated by the time of the scheduled end of construction.</p> <p>The AONBP consider that the phrase: <i>landscape and visual terms have a physical and visual limit of extent</i> is not helpful as all development has a physical limit to its visual impact, the AONBP consider that the impact on the AONB is more relevant, which has been defined as significant.</p> <p>The AONBP recognise that many of the impacts are felt in a limited geographical area, although the proposals for Sizewell C are one of the largest construction projects in Europe and the largest proposed in a nationally designated landscape. The AONB is a single entity and as such negative impacts on part of the AONB are impacts on the AONB as a whole and therefore on its statutory purpose.</p>	<p>SZC Co. note the position of the AONBP and has provided a detailed response within the SZC Co. response to the AONBP written representation [REP3-042].</p> <p>SZC Co. considers that the effects on landscape and visual receptors and the SCHAONB and Suffolk Heritage Coast have been accurately recorded in the Application documents and where significant adverse effects would arise, including in areas outside the EDF Energy Estate.</p> <p>SZC Co. considers it has taken all reasonable measures to mitigate the effects of the proposed development and highlights the role of the estate wide vision and Composite Operational Landscape</p>

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		<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>	<p>The AONBP recognise that mitigation packages are being considered but note that significant residual impacts will remain should the proposals be built as currently proposed as identified in applicants application documents and the National Policy Statements on Energy and Nuclear Power (EN-1 and EN-6).</p> <p>The AONBP consider that the construction site will stretch from the east to the west of the AONB and therefore in effect cut the AONB in two. Furthermore, the changes to the application mean that the construction site will have significantly more impact on the AONB from the proposed temporary beach landing facility stretching some 500m into the sea which is in the setting of the AONB where there is little opportunity for mitigation.</p> <p>The AONBP do not consider that the SZC development will contribute to the statutory purpose of the AONB and that land which is currently delivering the statutory purpose will no longer be able to deliver that purpose. The AONBP recognises that existing nuclear power stations are a feature of the AONB.</p> <p>The AONBP recognises that the AONB has a statutory boundary. It may be that boundary is not marked on the ground and that the AONB and its setting share many characteristics but there is a hard boundary to the AONB. However, development in the setting of the AONB, such as the temporary beach landing facility and accommodation campus does have the potential</p>	<p>Masterplan and Estate Wide Management Plan (EWMP), and the Natural Environment Improvement Fund within the Deed of Obligation (Doc Ref 8.17(H)/10.4) in mitigating the residual effects of the proposed development and delivering localised enhancements to the SCHAONBP and its setting (see AONBP-1.5)</p>

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			<p>to negatively impact the purpose of the AONB designation.</p> <p>The AONBP prefer the use of terminology from the agreed natural beauty and special qualities document agreed with the applicant, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council] rather than other terminology.</p> <p>The AONBP does not consider that a new road crossing the AONB, and in its view that it splits the AONB into two, contributes to the statutory purpose of the AONB.</p>	
AONBP-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 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.</p>	<p>The AONBP welcomes the applicant's recognition of the AONB and Heritage Coast and notes that all public bodies have a duty of regard to the purpose of the AONB designation under section 85 of the Countryside and Rights of Way Act 2000.</p> <p>The AONBP notes the role of Natural England and Local Authorities in meeting the purpose of Heritage Coasts.</p>	SZC Co. note the position of AONBP.
AONBP-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.	The AONBP agree that the applicant and AONBP take a different view on effects of the Sizewell B relocated facilities application that has been determined by the Local Planning Authority.	SZC Co. note the position of AONBP.
AONBP-2.5	Assessment of Effects	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	The AONBP recognise that the applicant has sought to reduce the negative impacts of the proposed development, such as design of turbine	SZC Co. note the position of the AONBP and has provided a detailed response within the SZC Co. response to the AONBP

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		<p>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 studyo Careful design of proposed sea defences as naturalistic dune features similar to those on the coast in the immediate areao 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>	<p>halls, design of sea defences and retention of some screening, on the defined characteristics of the AONB. However, the AONBP does not consider that the proposals, as submitted, will contribute to the purpose of the AONB.</p> <p>The AONBP note that the applicant is seeking to introduce screening of the proposed development. It is the AONBP view that screening is a mechanism used by developers to hide development that does not contribute to the purpose of the AONB and has a negative impact on landscape character.</p> <p>The AONBP diverges from the view of the applicant in that the proposed development will have a negative impact on the AONB, as recognised in the National Policy Statements on Energy and Nuclear Power (EN-1 and EN-6) and that the scale of the proposals and the fact that the design is repeated from a similar installation at Hinkley Point C which is not in a nationally designated landscape demonstrates that not all measures have been taken to control the impacts.</p> <p>The AONBP do not consider that the Design Council put sufficient weight on the location of the proposals in a nationally designated landscape.</p>	<p>written representation [REP3-042].</p> <p>SZC Co. considers that the effects on landscape and visual receptors and the SCHAONB and Suffolk Heritage Coast have been accurately recorded in the Application documents and where significant adverse effects would arise, including in areas outside the EDF Energy Estate.</p> <p>SZC Co. considers it has taken all reasonable measures to mitigate the effects of the proposed development and highlights the role of role of the estate wide vision and Composite Operational Landscape Masterplan and Estate Wide Management Plan (EWMP) (Doc Ref 9.88(B)/10.15) and the Natural Environment Improvement Fund within the Deed of Obligation in mitigating the residual effects of the proposed development and delivering localised enhancements to the SCHAONBP and its setting (see AONBP-1.5)</p>

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AONBP-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 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</p>	<p>The AONBP agree with the view of the applicant that the present context of Sizewell B and its design to minimise impacts on the AONB will be compromised by the development of the Sizewell C complex and the installation of several new pylons, particularly from the north such as from the National Trust's coastguard cottages.</p> <p>The AONBP understands that the proposals for Sizewell C include the frontage of the development to be further to the east than Sizewell A and B and will dominate the views from the north due to its position to the east and height of the proposed development.</p> <p>The AONBP understands the applicant has sought to optimise the land take in the AONB including the Site of Special Scientific Interest but considers that during construction and operation much land will be unable to contribute to AONB purposes.</p> <p>The AONBP welcomes the applicant's commitment to update its cumulative impact as details of other nationally significant infrastructure projects become available</p>	<p>SZC Co. note the position of AONBP and refers to its statement that clearly sets out its position.</p>

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		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.		
AONBP-2.7	Alternatives	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.	The AONBP is not qualified or resourced to assess the options and feasibility work around the aspiration for undergrounding cables to join existing National Grid infrastructure and defers to statutory undertakers to meet their duty to the AONB under section 85 of the Countryside and Rights of Way Act 2000 when responding to this area. The AONBP consider the introduction of new pylons, even when designed to minimise negative effects, does not contribute to the statutory purpose of the AONB	SZC Co. note the position of AONBP.
AONBP-2.8	Tourism	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 just the DMO/Ipsos MORI surveys. Evidence from HPC provides strong support for the gap between ex-ante survey and reality. 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	The AONBP does not consider that either the construction phase over 9-12 years or the operation phase will benefit the tourism sector worth over £228M and supporting over 5,000 jobs in the AONB. The AONBP recognises that the applicant is seeking to deliver a Tourism Fund to compensate for impacts on the tourism industry and therefore considers that the applicant must consider that its proposals will negatively impact the tourism industry in the AONB by offering this fund.	SZC Co. note the position of AONBP.

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		outstanding point relating to the scale and timing of payments of the fund still to be discussed and agreed.		
AONBP-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>	<p>The AONBP consider that the significance of the impacts of the development proposals in its responses to consultations and relevant and written representations.</p> <p>The AONBP note the delays in similar projects and the benefits that can be accrued from using an experienced workforce and supply chain, although this would appear to suggest that the benefits to the AONB will be more limited as workforce will be drawn from existing work forces and existing suppliers that are not local to the AONB. Furthermore, the repeat design from Hinkley Point C suggests that the location of the Sizewell C project, in a nationally designated landscape, has not been fully recognised.</p>	SZC Co. note the position of AONBP.
AONBP-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>	<p>The AONBP agree that the approach to visualisations presented in the LVIA of the original Development Consent Order were agreed by consultees including the AONB.</p> <p>However, the AONBP do not consider that the impacts of the revised application, including a 500m beach landing facility, have sufficiently assessed the impacts on the defined qualities of</p>	SZC Co. note the position of the AONBP and considers that the effects of the temporary beach landing facility have been appropriately assessed.

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			the AONB including landscape quality, scenic quality, relative wildness, relative tranquillity.	
AONBP-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.	<p>SSSIs are sites with highest value for either wildlife and/or geodiversity, which are defined features of the AONB (as a natural heritage feature) and proposed loss of SSSI is unacceptable as this cannot be satisfactorily mitigated for within the AONB</p> <p>Furthermore, The AONBP consider the loss of part of the Site of Special Scientific Interest and the impacts of the associated crossing on AONB defined features of landscape quality and scenic quality and therefore this proposal does not contribute to the statutory purpose of the AONB.</p>	SZC Co. note SCHAONB Partnerships position and has provided a detailed response within the SZC Co. response to the AONBP written representation [REP3-042] .
AONBP-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.	<p>SSSIs are sites with highest value for either wildlife and/or geodiversity, which are defined features of the AONB (as a natural heritage feature) and proposed loss of SSSI is unacceptable as this cannot be satisfactorily mitigated for within the AONB</p> <p>Furthermore, The AONBP consider the loss of part of the Site of Special Scientific Interest and the impacts of the associated crossing on AONB defined features of landscape quality and scenic quality and therefore this proposal does not contribute to the statutory purpose of the AONB.</p>	SZC Co. note the position of AONBP.

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AONBP-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 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.	The AONBP recognise the applicants work to mitigate the permanent effects of the access road. However, it notes that the access road does not contribute to the natural beauty or purpose of the AONB. Furthermore, the AONBP considers the introduction of reprofiling of the AONB landscape to be of concern and has significant potential to have a negative impact on the defined AONB qualities including landscape quality, scenic quality, relative wildness and natural heritage features by the introduction and creation of a human made landscape.	SZC Co. note the position of AONBP.
AONBP-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>	The AONBP considers that the introduction of a railway in the AONB for an anticipated 9-12 years, noting that it is intended to be removed during the final 24 months will bring negative impacts to some of the defined AONB qualities- particularly scenic quality and relative tranquillity which will not contribute to the purpose of the AONB.	SZC Co. note the position of AONBP.
AONBP-2.15	Night-time assessment	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 & Heaths AONB.	The AONBP do not concur that the lighting of Sizewell A and Sizewell B stations be included in the baseline environment as these are temporary	SZC Co. considers that consideration of Sizewell A and Sizewell B as part of the

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		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).	features. For clarity it is understood that like Sizewell C the stations Sizewell A and Sizewell B will be decommissioned and are therefore considered are temporary.	baseline environment is appropriate in the assessment of effects on landscape and visual receptors and the SCHAONB and Suffolk Heritage Coast, for the reasons as set out in it's stated position
AONBP-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 & 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 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.</p>	<p>The AONBP recognise that the withdrawal of proposals for a new car park in the AONB would lead to less damage to the AONB. However, the extension to the proposed operational car park would mean this element having an increased negative impact on the AONB.</p> <p>The AONBP considers that screening developments in the AONB is a technique used to hide development that does not contribute to either the purpose of the AONB or its associated landscape character.</p> <p>The AONBP notes the request by other stakeholders on this matter.</p>	SZC Co. note the position of AONBP.

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AONBP-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 & 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>	<p>The AONBP welcome work to minimise impacts on users of the proposed England Coast Path and Suffolk Coast Path.</p> <p>However, it also has concerns about the impacts of the proposed temporary beach landing facility on users of the proposed England Coast Path and Suffolk Coast Path, both in terms of access and experience due to noise, light and visual intrusion of the facility that formed part of the changed DCO in late 2020</p>	SZC Co. note the position of AONBP. Further information regarding the interactions between the Coast Path and development can be found in the Environmental Statement Addendum [AS-181]
AONBP-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	The AONBP considers that development in the setting of the AONB, such as for the proposed accommodation campus, should demonstrate its duty of regard to the AONB. The proposals as submitted would appear to have a negative impact on the defined AONB characteristics,	SZC Co. note the position of AONBP.

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		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.	including landscape quality, scenic quality, relative wildness and relative tranquillity and have a negative impact on views into and out of the AONB.	
AONBP-2.19	Statutory purpose of the AONB and Assessment of Effects	<p>The location of the Sizewell C nominated site within the Suffolk Coast & 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.</p> <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 & 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.</p>	<p>The AONBP consider that the proposals for Sizewell C which share many similar design elements to Hinkley Point C development, do not demonstrate that the location of the proposals for Sizewell C have been given appropriate weight, given that the Sizewell C proposals are in a nationally designated landscape. It considers that elements of the AONB, and Site of Special Scientific Interest, have been compromised in an attempt to deliver a project of this scale in this location.</p> <p>The AONBP recognises the applicant has sought to reduce the adverse impacts on the AONB from its proposed development but notes that the applicant and National Policy Statements relating to energy and Nuclear Power (EN-1 and EN-6) recognise that there will be residual impacts on the AONB. This is exacerbated by the scale of the proposals which will damage the embedded mitigation for Sizewell B and double the operational size of nuclear operations in the AONB. In addition, the 9-12 years of construction will have significant effects on AONB purpose.</p> <p>The AONBP consider the impacts on tranquillity from the proposed development include:</p>	SZC Co. note the position of AONBP. Appendix D [REP2-111] of the SZC Co. responses to the ExA questions provides a detailed comparison of SZC and HPC.

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		<p>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>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>	<ul style="list-style-type: none">• Introduction of significant new lighting in the AONB• Loss of birdsong and the ability to hear birdsong• Loss of semi natural habitat, in particular loss of AONB land to deliver AONB purpose and area of Site of Special Scientific Interest• Loss of ability to hear waves• Introduction of significant human activity and building of major infrastructure• Loss of dark skies and ability to see stars• Introduction of construction and traffic noise• Introduction of large numbers of people working on site• Introduction of new overhead power lines• Introduction of urban development on fringe of AONB (accommodation campus)• Introduction of new road in AONB• Introduction of railway into AONB	
AONBP-2.20	Mitigation	Schedule 11 of the Deed of Obligation	The AONBP has published a position statement on how it considers a section 106 fund might operate. It considers that the applicant can learn from the experience of the section 106 related to	The scale and structure of the Natural Environment Fund has been agreed with East Suffolk

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			<p>the Sizewell B dry Fuel Store. It considers a section 106 preferable to a section 111 agreement.</p> <p>The AONBP recognise that at deadline 8 a Deed of Obligation that has been agreed with East Suffolk Council and Suffolk County Council and the applicant. The sums involved are not proportionate to a scaling up of a section 106 for the Sizewell B Dry Fuel Store and are designed to be spent within the AONB and outside the AONB. The AONB P consider that the majority of impacts are on the AONB</p>	Council and Suffolk County Council.

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