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Sizewell C proposed New Nuclear Development. Stage 3 pre Application Consultation: Response from the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership.

In summary the response from the AONB Partnership is:

- The consultation and associated documents **do not pay proper regard for the purposes of the AONB.**
- The development **would cause significant harm** to the nationally designated AONB
- The consultation **does not adequately demonstrate measures to limit the damage to the AONB** through the mitigation hierarchy, namely avoidance, minimisation, mitigation and compensation.
- There have been only **minimal attempts in the consultation to demonstrate the impacts** of the development on the AONB
- The consultation **does not pay sufficient regard to the in combination impacts** of other Nationally Significant Infrastructure Projects and major developments in the area such as East Anglia One North and East Anglia Two and Sizewell A, Sizewell B, Galloper and Greater Gabbard.

A developed version of this summary is reproduced in this response.

The AONB Partnership

The Partnership was formed in 1993, it comprises public, private and voluntary organisations who are committed to conserving and enhancing the Natural Beauty of the AONB. The Partnership's role is to oversee delivery of the AONB Management Plan. It meets twice a year to discuss significant issues in the AONB, and delivery of the Plan.

The AONB Partnership consists of;

Suffolk County Council, Essex County Council, Babergh District Council, Suffolk Coastal District Council, Waveney District Council, [Suffolk Coastal and Waveney to become East

Suffolk Council on 1 April 2019] Tendring District Council, Ipswich Borough Council, Country Land and Business Association, The Crown Estate, Defra, Historic England, Environment Agency, Forestry Commission, Haven Gateway Partnership, National Farmers' Union, National Trust, Natural England, Royal Society for the Protection of Birds, Suffolk Association of Local Councils, Community Action Suffolk, Suffolk Coastal Business Forum, Suffolk Coast Ltd, Suffolk Farming & Wildlife Advisory Group, Suffolk Preservation Society, Suffolk Coast Against Retreat, Suffolk Wildlife Trust.

It should be noted that many of these partners are public bodies or statutory undertakers which have the duties to conserve and enhance the Natural Beauty of the AONB as set out in section 85 of the Countryside and Rights of Way Act (2000). Therefore, AONB interests will be raised by a number of partners. Furthermore, whilst the AONB team is not a statutory consultee, those partners with the statutory responsibility for the AONB and who are such consultees, will continue to identify relevant issues between stage 3 and the submission of a Development Consent Order, anticipated to be in quarter 1 of 2020.

The AONB Partnership Response to the Stage 3 Consultation

This is a Partnership response and in that regard has sought to address issues in a level of detail that all Partners can support. However, given the membership of the Partnership includes members of local authorities and statutory agencies many partners will be making their own responses, as bodies that have statutory duties to the AONB.

Many partners are custodians of Natural Beauty indicators and Special Qualities of the AONB, this AONB Partnership response should be seen as complementary to those responses, rather than the only response addressing AONB issues. Many partner responses will also address AONB concerns.

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty AONB Partnership have seen and reviewed the *Consultation Summary Document* and *Volume 1 Development Proposals*, *Volume 2 Preliminary Environmental Information* and *Volume 3 Preliminary Environmental Information Figures* (all dated January 2019) relating to the Sizewell C Proposed Nuclear Development.

The consultation documents relate to a proposal in which both the operational site and the construction area are within, the Suffolk Coast & Heaths AONB, which is nationally designated under the *National Parks and Access to the Countryside Act (1949)*. The legal framework for AONBs in England and Wales is provided by the *Countryside and Rights of Way Act (2000)* which reaffirms the primary purpose of AONBs: to conserve and enhance Natural Beauty.

The AONB Partnership therefore consider that EDF Energy, as a statutory undertaker as defined by section 85 of the Countryside and Rights of Way Act 2000, have a duty to have regard for the purposes of the AONB in decision making. The AONB Partnership therefore seek to understand how EDF Energy have met this obligation when developing their proposals. That duty is reproduced below (taken from England's statutory landscape designations: a practical guide to your duty of regard ISBN 978-1-84754-200-7 Catalogue Code: NE243)

Use of the word 'duty' in the legislation means that having regard to AONB/National Park purposes is something all 'relevant authorities' must do: it is not discretionary. This point is reinforced by use of the word 'shall' rather than, for example, 'may'. The legislation is also clear in identifying the circumstances in which this duty must be fulfilled, ie 'in exercising or performing any functions in relation to, or so as to affect land' in an AONB or National Park.

The consultation further relates to development proposals adjacent and outside the AONB but will have an impact on the AONB. Therefore, the AONB Partnership consider that EDF Energy have a duty to consider the purposes of the nationally designated AONB for these developments as outlined in DEFRA's guidance note (the relevant section is reproduced below from the DEFRA publication Product code PB 10747 REV 1/07):

Additionally, it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas.

The AONB Partnership response to the Sizewell Stage 3 consultation is formed of three parts:

1. A developed summary of AONB Partnership response
2. Comments made under EDF Energy's consultation themes
3. Expert advice from the AONB's consultants

1. A developed summary of AONB Partnership response

- The consultation and associated documents **do not pay proper regard for the purposes of the AONB.**

Section C.8.102 i of the annexes to the National Policy Statement for Nuclear Power Generation (EN-6) states that

The site lies on the Suffolk Heritage Coast and is wholly within the Suffolk Coast and Heaths AONB

Despite this and despite the fact that the AONB Partnership raised the issue in its response to the stage 2 consultation EDF Energy still refer mistakenly to the AONB designation being a 'locally designated area' [sec 3.6.6 Volume 1 Development Proposals]. It is demonstrated that EDF Energy do not appear to understand the significance of the AONB designation as set out in the national policy or pay proper regard to the AONB or its purposes in designing its development proposals.

Section 3.10.3 of the National Policy Statement for Nuclear Power generation (EN-6) states that:

There is the potential for long-term effects on visual amenity, especially at Sellafield because of the proximity to the Lake District National Park, and at Sizewell, given the Suffolk Coast and Heaths Area of Outstanding Natural Beauty

Despite this and despite the request in the AONB Partnership's stage 2 consultation response EDF Energy have not undertaken a suitable assessment of the impact of the proposed development on the nationally designated AONB. The mechanism to measure this damage, in the form of impact on the agreed and defined Natural Beauty and Special Qualities document, is available. It would appear that EDF Energy have chosen not to publish any detailed work on how the Natural Beauty and Special Qualities would be impacted apart from a reference to 'significant' harm in the summary document.

The Overarching National Policy Statement for Energy (EN-1) para 5.9.9 states that:

Development proposed within nationally designated landscapes

'National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to

landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas’.

The AONB Partnership is not convinced that the proposals as they currently stand have demonstrated the conservation of natural beauty has been given substantial weight. This concern is raised for the construction phase and the operational phase of the proposal.

National Policy Statement for Electricity Networks Infrastructure (EN-5), paragraph 2.8.9 notes:

2.8.9 The impacts and costs of both overhead and underground options vary considerably between individual projects (both in absolute and relative terms). Therefore, each project should be assessed individually on the basis of its specific circumstances and taking account of the fact that Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or sub-sea line if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable. In this context it should consider:

- *the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads)*

Despite this EDF Energy are proposing the introduction of new overhead lines in an AONB which the AONB Partnership considers not compliant with the National Policy Statement NP5 as outlined above.

- The development **would cause significant harm** to the nationally designated AONB.

An Area of Outstanding Natural Beauty (AONB) is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty. The Natural Beauty has been defined in agreement with the AONB Partnership and EDF Energy in the document Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB): Natural Beauty and Special Qualities Indicators V1.8 21 Nov 2016.

It is The AONB Partnership's view that the proposed development would cause significant and unacceptable harm that includes, but is not limited to, the following. The Natural Beauty and Special Qualities characteristics most impacted by these elements is noted:

- **Construction:** The proposed construction phase is planned to take 9-12 years and would sever the AONB into two parts. This proposal would have significant and unacceptable harm, from the scale of the construction site and its associated requirements such as for lorries, cranes, importing of materials, workforce requirements to the purposes of the defined AONB characteristics, notably its landscape quality, scenic quality, relative wildness, relative tranquillity and its natural heritage features.
- **Introduction of new pylons:** The proposals to introduce new electricity distribution infrastructure into the AONB in the form of four new taller pylons is unacceptable when considering it is technologically possible to underground such infrastructure. The new towers would have a significant and unacceptable negative impact on the AONB characteristics, notably the landscape quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage.
- **Introduction of new transport infrastructure:** The proposal to introduce a helipad, new access road and temporary railway line into the AONB would have a significant and unacceptable impact on the AONB characteristics, notably the landscape quality, Scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage.
- **Design:** The design proposals make an unacceptable and minimal acknowledgement of being constructed in a nationally designated landscape. There is little reflection in the proposals of the location of the development being within the nationally designated AONB. The impact of its mass, colouration, layout and scale on the AONB characteristics is significant and unacceptable, notably the landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features and cultural heritage.
- **Training Centre and Car Park:** The proposals include a substantial training centre and car park in the AONB. The AONB Partnership consider that these elements do not need to be within the nationally designated AONB as alternatives to location outside the AONB are possible for these elements. The proposals have not made the case for these elements to be required within the nationally designated AONB. It is worth noting that during recent proposals by ScottishPower Renewables a site outside the AONB is the preferred option for major on shore infrastructure.
- **Setting of the AONB:** The proposals include the development of a major accommodation campus with buildings up to 4 storeys high within the immediate, ie hard up to AONB boundary, setting of the AONB which would have a significant and unacceptable impacts on the AONB characteristics. This is most notable on the landscape quality, scenic quality, relative wildness, relative tranquillity and cultural heritage qualities of the AONB.

- **Stacks and Chimneys:** The introduction of construction cranes which are anticipated to be several times higher than the existing Sizewell A + B stations and the permanent introduction of stacks at Sizewell C (that were not depicted in the model during the public consultation events) that will emit steam will both significantly impact on the reasons for the AONB designation, bringing an unacceptable and long term industrialised feel to the area.
- **Biodiversity Habitat:** The loss of nationally important Site of Special Scientific Interest land and the associated landscape quality losses associated with the SSSI crossing would have a significant and unacceptable impact on the AONB characteristics. This is most notable for the landscape quality, scenic quality relative wildness, relative tranquillity and natural heritage features
- **Access to and within the AONB:** The proposals for the construction phase and operation phase would have a significant impact upon access to the nationally designated AONB. The construction site would see the AONB severed in two for the duration of the construction phase. When in use a Beach Landing Facility for use during construction and operation phases (and presumably decommissioning phases) would prevent use of the Suffolk Coast Path and the proposed England Coast Path on the current alignment. Further consideration of alternatives should be made. Proposals for a diversion for several miles in land is significant and unacceptable to the Special Qualities of the AONB and the associated factors identified in the Natural Beauty and Special Qualities document, notably health and well-being, community, and economy.
- **Value of AONB to Society:** The AONB is a special place. Suffolk residents voted in an East Anglian Daily Times survey in 2017 that 'coast and countryside' were the two most important factors of their enjoyment of living in Suffolk. The tourism industry in the AONB is worth £210M and supports over 4,600 long term jobs. The health and well-being and public good from the outstanding landscape are virtually beyond economic calculation. The proposals would have a significant and unacceptable impact on the value of the AONB to many of its residents and businesses (who trade on the natural beauty and special qualities of the area). This is most notable on the identified natural beauty and special qualities defined characteristics of landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features, cultural heritage, health and well-being, community, economy and ecosystem goods and services.
- **Intrusion into long views:** The proposals would appear to introduce significant built development further east and jutting out from the existing Sizewell A and B developments. This intrusion into the AONB and the associated negative impact on long views is unacceptable in the nationally designated AONB. This is of particular concern from popular impacted areas on the Suffolk Coast such as Southwold, Dunwich Heath (Coast Guard Cottages) and Thorpe Ness.
- **Water Management Zones:** The proposals introduce inappropriate landscape features into the AONB including water management zones. The proposals do not

reflect, or work with, the current landscape character, the defined features of the AONB, and would have a significant negative impact on the AONB.

- **Heritage Coast:** The proposals will impact the Suffolk Heritage Coast. Heritage Coast's were established to conserve the best stretches of undeveloped coast in England. A heritage coast is defined by agreement between the relevant maritime local authorities and Natural England. The proposals do not appear to consider the purposes of the defined landscape.
- The consultation **does not adequately demonstrate measures to limit the damage to the AONB** through the mitigation hierarchy, namely avoidance, minimisation, mitigation and compensation.

Section C.8.82 of the Annexes to the National Policy Statement for Nuclear Power Generation (EN-6) includes the following:

the Appraisal of Sustainability 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

It includes the following table:

Table 6.1: Summary of the Significance of Potential Strategic Sustainability Effects

Sustainable Development Themes:	Significance of potential Strategic effect at each Development stage:		
	Construction	Operation	Decommissioning
Air Quality	-	-?	-?
Biodiversity and Ecosystems	--?	--?	--?
Climate Change	-	++	-?
Communities: Population, Employment and Viability	+?	+?	0
Communities: Supporting Infrastructure	-	-	-
Human Health and Well-Being	+	+	+
Cultural Heritage	-	-	-
Landscape	--	--	0?
Soils, Geology and Land Use	-	-?	-?
Water Quality and Resources	-	-	-
Flood Risk	-	-	-
Key: Significance and Categories of Potential Strategic Effects			
++	Development actively encouraged as it would resolve an existing sustainability problem; effect considered to be of regional/national/international significance		
+	No sustainability constraints and development acceptable; effect considered to be of regional/ national/international significance		
0	Neutral effect		
-	Potential sustainability issues, mitigation and/or negotiation possible; effect considered to be of regional/national/international significance		
--	Problematical because of known sustainability issues; mitigation or negotiation difficult and/or expensive; effect considered to be of regional/national/ international significance		
Uncertainty			
?	Where the significance of an effect is particularly uncertain, for example because insufficient information is available at the plan stage to fully appraise the effects of the development or the potential for successful mitigation, the significance category is qualified by the addition of '?'		

Despite this EDF Energy have not adequately put forward an assessment of the likely impacts and details of how they might be avoided, minimised, mitigated and compensated through a mitigation package.

- There have been only **minimal attempts in the consultation to demonstrate the impacts** of the development on the AONB

Section C.8.72 of the Annexes to the National Policy Statement for Nuclear Power Generation (EN-6) includes the following:

...given the likely scale of the development, there are likely to be some long lasting adverse direct and indirect effects on landscape character and visual impacts on the AONB.

Despite this and that EDF Energy and the AONB Partnership have agreed the Natural Beauty and Special Qualities of the nationally designated AONB [see Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Quality Indicators V1.8 21 November 2016] the consultation appears to have made minimal attempts to assess the impacts on the AONB.

Furthermore, despite comments made by the AONB Partnership during the stage 2 consultation, EDF Energy proposals do not give due prominence to the AONB in the consultation documentation or as part of the consultation events.

- The consultation **does not pay sufficient regard to the in combination impacts** of other Nationally Significant Infrastructure Projects and major developments in the area such as East Anglia One, East Anglia One North and East Anglia Two and Sizewell A, Sizewell B, Galloper and Greater Gabbard.

The AONB Partnership acknowledge that a Cumulative Impact Assessment will be required as part of the Environmental Impact Assessment that will form part of the Development Consent Order but are disappointed that there has been little attempt to assess the cumulative impacts on the nationally designated AONB as part of the stage 3 consultation to help inform understanding of the development proposals. It appears that there has been little joined up thinking with National Grid at an earlier stage.

2. Comments made under EDF Energy's consultation themes

In the absence of an appropriate assessment by EDF Energy of the proposals against the agreed (between EDF Energy and the AONB Partnership) Natural Beauty and Special Qualities document (V1.8 21 Nov 2016) as requested in the AONB Partnership's Stage 2 response the AONB Partnership will outline the significant impacts of the proposed developments and request EDF Energy acknowledge this damage and consider mitigation and compensation in its Development Consent Order.

1. Sizewell C Proposals: Overall

The AONB Partnership consider that the Sizewell C construction phase will significantly harm the AONB and its economic well being given that the area promotes itself as a place of quiet recreation opportunity. The agreed Natural Beauty and Special Qualities document define the scenic quality of the Suffolk Coast & Heaths AONB as:

Unique character defined by semi-natural and cultural landscapes (notably sea, coast, estuaries, reedbeds, Sandlings heath, forest, farmland and villages) and built heritage features (such as Martello towers, pill boxes, river walls), creating a juxtaposition [of] elements in a relatively small area.

It further defines the relative tranquillity of the AONB as:

Areas of semi natural habitat, where there is a general absence of development and apparent human activity, contribute to a sense of relative tranquillity. Further enhanced by sounds (bird calls, the wind through reeds in estuaries, waves on shingle) and relatively dark skies.

The AONB Partnership note that the operational phase of the proposed Sizewell C development will introduce a significant built development into the AONB.

The agreed Natural Beauty and Special Qualities document define the relative wildness of the Suffolk Coast & Heaths AONB as:

Largely undeveloped coastline and offshore areas and areas of semi-natural habitat including Sandlings heath, forests, reedbeds, estuaries and marshland.

The AONB Partnership consider the operational phase of the proposed Sizewell C development as having unavoidable impacts on the nationally designated landscape.

Should the development go ahead the AONB Partnership consider that the developer should set up an 'AONB fund' similar to the 'Tourism Fund' referenced in p18 of summary document should be adequate to offset the impacts to the natural beauty and special qualities of the AONB and run from the time the Development Consent Order is submitted to after the decommissioning phase.

The AONB Partnership consider the decommissioning phase of the proposed Sizewell C development as likely to have unavoidable impacts on the nationally designated landscape.

We would invite EDF to begin discussions with the AONB Partnership as soon as Stage 3 consultation is completed.

2. Main Development Site: Overall

The proposals indicate that the nationally designated AONB would be severed into two sections during a stated construction period of 9-12 years. The construction would introduce a major civil engineering programme into the AONB with huge negative impacts on the defined natural beauty and special qualities. Furthermore, the proposals indicate significant development within the setting of the AONB which would further harm the nationally designated landscape to a significant and unacceptable level.

The agreed Natural Beauty and Special Qualities document define the scenic quality of the Suffolk Coast & Heaths AONB as:

Elevated vantage points provide impressive views over low lying coastal marshes, estuaries, beaches and expansive long distance views out to sea. Views to the coastline from out at sea are also noted.

The AONB Partnership does not consider that the main development site has paid regard to the purposes of the AONB in its proposals for the main development site. The proposals are for a similar design of building to that being built in a non-designated landscape and does not acknowledge the proposed construction is within an AONB.

Little is in the consultation relating to the impacts on the nationally designated AONB during the decommissioning phase.

The AONB Partnership consider the main development site of the proposed Sizewell C development as having unacceptable impacts on the nationally designated landscape.

Should the development go ahead the AONB Partnership consider that the developer should set up an 'AONB fund' similar to the 'Tourism Fund' referenced in p18 of summary document should be adequate to offset the impacts to the natural beauty and special qualities of the AONB and run from the time the Development Consent Order is submitted to after the decommissioning phase.

The AONB Partnership consider the decommissioning phase of the proposed Sizewell C development as likely to have ongoing unavoidable and unacceptable impacts on the nationally designated landscape.

3. People and Economy

The AONB Partnership notes that EDF Energy acknowledges that there will be adverse impacts on local businesses during the construction and operation phases of the proposed development. The tourism industry in the Suffolk Coast & Heaths is worth a calculated £263M pa and supports over 4,600 long-term jobs. These jobs and value to the local economy are based on the natural beauty of the Suffolk Coast. The agreed Natural Beauty and Special Qualities document notes:

The landscape is an important contributor to the local economy. The coast in particular is a major tourist destination.

The AONB Partnership consider that People and the Economy will be significantly impacted by the proposed Sizewell C development and have unacceptable impacts on the tourism business in the nationally designated landscape.

Should the development go ahead the 'Tourism Fund' referenced in p18 of summary document should be adequate to offset the impacts and run from the time the Development Consent Order is submitted to after the decommissioning phase.

The AONB Partnership consider the decommissioning phase of the proposed Sizewell C development as likely to have ongoing unavoidable and unacceptable impacts on the nationally designated landscape.

4. Accommodation: Overall Strategy

The AONB Partnership consider that the proposals to provide a 2,400 bed campus and 400 pitch caravan that would impact the AONB and its setting as to have likely and significant impacts on the AONB.

The Natural Beauty and Special Qualities document notes a detractor for natural beauty to be:

Urban development on the fringes of the AONB

Little is in the consultation relating to the impacts on the nationally designated AONB during the decommissioning phase.

The AONB Partnership consider that the overall strategy for accommodation will significantly impact the purposes of the AONB.

The AONB Partnership consider the decommissioning phase of the proposed Sizewell C development as likely to have ongoing unavoidable and unacceptable impacts on the nationally designated landscape.

5. Accommodation: Temporary Campus and Caravan Site

The AONB Partnership consider that the accommodation campus would have a significant negative impact on the AONB due to its location in the setting of the AONB. Development proposals that impact upon the purposes of an AONB are required to consider the purposes of the AONB, see section 85 of the Countryside and Rights of Way Act 2000.

The agreed natural beauty and Special Qualities document notes:

Largely undeveloped coastline and offshore areas and areas of semi-natural habitat including Sandlings heath, forests, reedbeds, estuaries and marshland.

The AONB Partnership consider that proposals for an accommodation campus and caravan site do not adequately pay the required regard to the purposes of the AONB and will have a significant adverse impact the purposes of the AONB.

6. Transport: Movement of Materials

The AONB Partnership consider that the movement of materials to the site be either road, rail or sea would have significant and unavoidable negative impact on the purposes of the AONB. It considers HGV movements from 07:00 to 23:00 for the rail led proposal and 'HGV operation potential for extended hours' (see page 24 of summary document) to be unacceptable in terms of impact on the natural beauty of the AONB.

The agreed Natural Beauty and Special Qualities document notes that part of the natural beauty of the area is:

Absence of major coastal road or rail route, due to estuaries, and intermittent 'soft edged', often lightly trafficked access routes across the AONB to the coastline from main routes inland, has contributed to the relatively undeveloped character of the Suffolk coast.

The AONB Partnership consider that the movement of materials the proposed Sizewell C development as likely to have unavoidable significant negative impacts on the nationally designated landscape.

7. Transport: Sizewell Halt or New Rail Siding

The AONB Partnership consider that either the proposed Sizewell Halt or New Rail Siding would lead to significant and unavoidable impacts on the purposes of the AONB.

The agreed Natural Beauty and Special Qualities document notes:

Areas of semi natural habitat, where there is a general absence of development and apparent human activity, contribute to a sense of relative tranquillity. Further enhanced by sounds (bird calls, the wind through reeds in estuaries, waves on shingle) and relatively dark skies.

The AONB partnership consider that there is little information on the proposed Sizewell Halt and New Rail Siding during the operational phase of the proposed Sizewell C development but consider that any developed proposals should consider the purposes of the AONB. However the proposals for HGVs to use Lover's Lane during the early years of the rail led proposals will have a significant adverse impact on the AONB.

Little is in the consultation relating to the impacts on the nationally designated AONB during the decommissioning phase.

The AONB Partnership consider the proposed Sizewell Halt or New Rail Siding associated with the proposed Sizewell C development as likely to have unavoidable significant negative impacts on the nationally designated landscape.

8. Transport: Rail-Led Strategy, Buckleswood Road

The AONB Partnership will not comment on the proposals relating to Buckleswood Road at this time.

9. Transport: Level Crossings

The AONB Partnership will not comment on the proposals relating to Transport: Level Crossings at this time.

10. Transport: Level Crossings (Rail Led)

The AONB Partnership will not comment on the proposals relating to Transport: Level Crossings (Rail Led) at this time.

11. Transport: Road-Led Strategy, Freight Management Facility

The AONB Partnership will not comment on the proposals relating to Transport: Road-Led Strategy, freight management facility at this time.

12. Transport: Park and Ride

The AONB Partnership will not comment on the proposals relating to Transport: Park and Ride at this time.

13. Transport: A12 Two-Village Bypass

The AONB Partnership will not comment on the proposals relating to Transport: A12 Two-Village Bypass at this time.

14. Transport: Road Improvements

The AONB Partnership note that the proposals relating to the A1094/B1069 are in and adjacent to the AONB. It considers that further detail is required to assess the proposals against the natural beauty criteria of the AONB.

It further notes that the developer and others involved in undertaking traffic management proposals at this location have a duty to pay regard to the purposes of the AONB.

15. Consultation Process

The AONB Partnership consider that EDF Energy have not adequately paid regard to the AONB during this stage 3 consultation process. It notes the following:

- i) The proposals have not been measured against the agreed natural beauty criteria, given the National Policy Statements acknowledge in the Appraisal of Sustainability

for the potential for some long lasting adverse direct and indirect effects on landscape character and visual impacts on the Suffolk Coast and Heaths AONB with limited potential for mitigation

this is both surprising and disappointing to the AONB Partnership.

- ii) There appears to be an absence of environmental information on which to assess the proposals.
- iii) The AONB Partnerships concerns raised at stage 2 consultation do not appear to have been addressed.
- iv) The AONB Partnerships requests for work by EDF to assess the impacts on the AONB to be done between stage 2 and stage 3 does not appear to have been undertaken.
- v) It was disappointing that the proposed chimney stacks did not appear on the model used by EDF Energy at its public consultation events.
- vi) The AONB Partnership is surprised to see reference to Aldhurst Farm wildlife habitat creation in the stage 3 consultation documents when EDF Energy stated in October 2015 that:

EDF, however, has pledged that it will create the new habitat “regardless of whether Sizewell C receives a development consent order”
- vii) The consultation process has not given due weight to the AONB as a nationally designated landscape. It is extraordinary that the developer has referred to the AONB as a ‘local designation’ in its consultation documents despite this error being pointed out to EDF at stage 2 consultation.

3. Expert advice from the AONB's consultants

Sizewell C

Comments on Stage 3 Consultation Documents

1 Introduction

1.1 Appointment

- 1.1.1 Alison Farmer Associates (AFA) and Waygood Colour were appointed by the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) to undertake a review of the Sizewell C Stage 3 Consultation documentation in the context of the AONB designation.
- 1.1.2 Documents which have been reviewed have included:
- Volume 1: Consultation Summary Document
 - Volume 2a/b: Preliminary Environmental Information
 - Volume 3: Preliminary Environmental Information Figures

1.2 Scope of work

- 1.2.1 The focus of this work is on the landscape and visual effects on the AONB landscape. Therefore, effects on landscape beyond the AONB designation are not considered.
- 1.2.2 The review is based on information provided within the Stage 3 Consultation Documents. It is noted that information on specific landscape and visual effects of the proposed development is limited, and that detailed assessment of effects will be provided within a full Landscape and Visual Impact Assessment in due course. Commentary on the Stage 3 Documentation therefore aims to constructively highlight broad issues and any gaps in information. It seeks to inform the AONB formal response to Consultation 3 as well as to highlight aspects which need to be addressed within the LVIA. Where specific aspects of the scheme are not mentioned in this report it should not be taken as acceptance of what is proposed. A more detailed review of the effects of the proposed development on the AONB will be required once a full LVIA has been prepared and made available.

1.3 Approach

- 1.3.1 The review has comprised desk top study document review, client meeting and site assessment. Both AFA and Waygood Colour have worked within the AONB landscape on previous occasions and existing knowledge of the area has also been drawn on during the review.

2 Context

2.1 Policy Context

2.1.1 AONBs are nationally valued landscapes designated for their Natural Beauty. The purpose of AONB designation is to 'Conserve and Enhance Natural Beauty' (National Parks and Access to the Countryside Act 1949) and Countryside and Rights of Way Act (2000).

2.1.2 The Overarching National Policy Statement for Energy (EN-1) para 5.9.9 requires that:

Development proposed within nationally designated landscapes

'National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.'

2.1.3 The National Planning Policy Framework (NPPF), Feb 2019 para 172 requires that:

'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest level of protection in relation to these issues.....The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest'.

2.1.4 The National Policy Statements (NPSs) and in particular NPS EN-1 Part 5 and EN-6 set out detailed technical requirements in relation to the landscape impacts of energy developments and specifically nuclear power generation. The Stage 3 Consultation Documents acknowledge that the ES associated with Sizewell will need to meet the requirements set out in these NPSs.

2.1.5 EN-1 para 5.9.9 reiterates the requirement of NPPF para 172. It states that the Infrastructure Planning Committee (IPC) should give substantial weight to the conservation of Natural Beauty of the landscape in deciding on applications for development consent in nationally protected areas.

2.1.6 EN-1 also emphasises that projects need to be designed carefully and that the aim should be to minimise harm and avoid compromising the purposes of designation. Projects consented in designated landscapes should be carried out to a high environmental standard (para 5.9.11).

2.1.7 Paragraph 5.9.12 goes on to state that there may be exceptional circumstances where amending the design of a proposed development delivers very significant benefit that it warrants a small reduction in function or operational constraint. The IPC will decide when the benefits of mitigation, to reduce landscape and/or visual effects, outweigh any marginal loss of function.

2.1.8 The Stage 3 Consultation makes it clear that the proposed main site design is derived from that developed for Hinkley in the South West of England and that there is a technical need to follow the principles of Hinkley in terms of the size of the turbine halls and how they functionally relate

to the reactor buildings and associated infrastructure. However, it states in para 7.4.11 of Volume 1, that the architectural design has been developed to create a bespoke and innovative solution which celebrates the location within the AONB. There appears to be little evidence of how this has been achieved in the consultation documentation save for reference to a colour study (para 7.4.14), although no details of this are provided. Whilst the design details noted in paragraphs 7.4.12 and 7.4.13 may seek to refine the buildings at a local level they do not capture the subtlety of colour within the receiving landscape nor address the scale, mass or composition of the scheme especially when viewed from the wider landscape and in the context of Sizewell A and B. Furthermore, the Stage 3 consultation Volume 2a highlights that there will remain significant adverse residual landscape and visual effects as a result of the main site development.

- 2.1.9 ***No information has been provided regarding refinement of the design in terms of building scale, orientation, position in order to reduce wider landscape effects on the AONB. Given the national importance of the AONB, and requirement of the IPC to weigh up the benefit of design refinements to reduce adverse effects against any loss of functionality, it is considered essential this iterative design process is considered and presented in the Environmental Statement (ES) and Landscape and Visual Impact Assessment (LVIA).***

2.2 Designation History and Special Qualities

- 2.2.1 The Suffolk Coast & Heaths AONB was designated in 1970 and included Sizewell A which was already in existence at the time of designation.
- 2.2.2 Sizewell B was developed in the 1980's, constituting major development within the AONB. It comprised a bespoke design, the composition of elements being carefully considered along with the colour and finish of the external materials, to create a landmark feature and distinct composition of built elements when viewed from the wider landscape.
- 2.2.3 In November 2016 EDF published a document on the Natural Beauty and special qualities of the AONB. It comprised two parts. The first considered the factors which contribute to Natural Beauty (as defined by Natural England¹) and the second considered factors termed 'special qualities'. These latter factors are not however special qualities as defined by Natural England² which defines them as:

'Aspects which make an area distinctive/valuable particularly at a national scale'

- 2.2.4 The Natural Beauty and Special Qualities report nor the information contained in Volume 2 Consultation Documents, fully reflect special qualities at a local level.
- 2.2.5 ***Further consideration of special qualities at a local level within the 15km study area should be presented within the LVIA.***

¹ Guidelines on Assessing Landscapes for Designation, March 2011, Natural England, Annex A

² Guidelines on Assessing Landscapes for Designation, March 2011, Natural England para 8.13

2.3 Existing Colour Study

- 2.3.1 In 2018 Suffolk Coast & Heaths AONB commissioned a guidance document on the selection and use of colour in development. This guide assessed the indigenous colour palette of each of the landscape character types which formed the AONB and set out colour ranges for use in development within that type. The purpose of the document is to assist with the integration of development into the landscape in a way which respects Natural Beauty and special qualities at a local level.
- 2.3.2 ***The Stage 3 consultation documents do not make reference to this colour study. This represents a missed opportunity to reduce the impact of the proposed development on the AONB. The colour study provides vital base line information and sets out a methodology for assessing and developing palettes which will at the minimum establish a connection between the new structures and the receiving landscape.***

3 Special Qualities of the Receiving AONB Landscape

3.1 Special Qualities

3.1.1 The Stage 3 Consultation on landscape and visual effects defines a study area of 15km radius from the Sizewell C main site. Within this area the AONB landscape can broadly be divided into three – land to the north, land immediately adjacent to the site and land to the south. In each of these areas Natural Beauty is expressed in subtly different ways and the existing development of Sizewell is also perceived in subtly different ways. These are set out as special qualities for each area below:

3.1.2 ***Land to the north:***



- Open expansive inland marshes with distinct simplicity, colour and texture.
- Lack of human activity – movement comes from light, water and wind.
- Heathland meets the coast forming low cliffs and affording rare elevated views.
- Narrow coastal strip but sense of space derived from the open sea association.
- Expanse of landscape, seascape and skyscape gives rise to sense of ‘emptiness’ and expansiveness.
- Dominant horizontal emphasis and distinctive vegetated simple ridgeline/skyline.
- Graduated hues and tones within each feature e.g. wet sand to dry sand to shingle, tussocks of Maran grass to trodden footways etc.
- Potential for colour hues and tones to vary with the movement of tides and winds.

- Strong tranquillity and sense of wildness derived from tangible natural processes, exposure to the elements, habitat and wildlife.
- Sizewell is perceived as a discrete cluster of development comprising three clearly legible components – Sizewell A, Sizewell B dome and Sizewell B blue building creating a balanced composition and accent point.

3.1.3 ***This landscape is susceptible to development that alters the distinctive composition and landmark qualities of the existing Sizewell site, creates visual clutter and increases the scale of the development at the main Sizewell site. Furthermore, development which breaks the simple skyline and introduces movement and new man-made elements will influence the special qualities of this landscape, contrary to AONB designation.***

3.1.4 ***Land immediately adjacent to the site:***



- Narrow coastal strip within the AONB designation, but sense of space derived from the open sea association.
- Natural landscape and open sea dominate giving rise to simple lines and uncluttered character.
- Tangible soft textural qualities to the landscape which have a unity and intactness along the sea edge.
- Expanse of landscape, seascape and skyscape gives rise to sense of ‘emptiness’ and expansiveness.
- Distinct linear banding and quick succession of landscape types along the coast but which closely relate to each other and have clear inter-visibility.
- Linear bands of colour with a dominant horizontal emphasis.

- Graduated hues and tones within each feature e.g. wet sand to dry sand to shingle, tussocks of Maran grass to trodden footways etc.
- Potential for colour hues and tones to vary with the movement of tides and winds.
- Strong presence and mass of Sizewell but lack of human activity – movement comes from sunlight, water and wind.
- Strong tranquillity derived from tangible natural processes, habitat and wildlife.

3.1.5 ***The narrowness of this landscape make it susceptible to development that urbanises and industrialises the area and which causes physical and perceptual fragmentation of the linear coastal landscape. It is also susceptible to increases in development and activity which introduce mechanical noise and movement and which would undermine perceptions of tranquillity and naturalness, a key quality of the AONB.***

3.1.6 ***The land to the south:***



- Distinct linear banding and quick succession of landscape types along the coast which are experienced collectively and have clear inter-visibility.
- Narrow coastal strip, but sense of space derived from the open sea association.
- Natural landscape with simple lines and uncluttered character.
- Coastal road provides easy access, movement and activity.
- Tranquillity derived from tangible natural processes, habitat and wildlife.
- Throopeness sits on a subtle promontory jutting into the sea, buildings comprise a scattered arrangement and are small in scale.
- The Clam, House in the Clouds, windmill and Church tower at Thorpeness all form local landmarks distinctive in their form, colour and because they break the skyline.

- The mass and simplicity of Sizewell A and distinctive form and colour of Sizewell B contrast with the small-scale organic character of built form in Thorpeness.
 - Pylons break the skyline inland but are partially obscured by vegetation.
- 3.1.7 Sizewell A and B are read together (the dome of Sizewell B partially obscured by Sizewell A) and sit in the background of this landscape, the lower portions of built form screened by vegetation. From most locations they read as physically separate from Thorpeness and other key landmarks.
- 3.1.8 ***This landscape is susceptible to development which breaks the skyline and causes visual clutter or detracts from and or obscures existing valued landmarks. It is also susceptible to development which is of such scale that it alters perceptions of the settled and 'human scale' elements of this landscape.***
- 3.1.9 ***The special qualities of the AONB landscape at a local level will inform susceptibility and sensitivity of the landscape to the proposed development and will need detailed consideration within the LVIA.***
- 3.1.10 Volume 2 of the Stage 3 Consultation documents identifies the Suffolk County LCA as the key framework for assessing landscape and visual effects (para 2.2.5). This character assessment identifies landscape types that, within the AONB, comprise narrow bands along the coast. ***Given the special qualities of the AONB, it will be important that landscape effects consider the interrelationship between landscape types and effects of the proposed development on perceptions and views where landscape types interrelate.***

3.2 Character of the Existing Sizewell Site

- 3.2.1 Sizewell C is not a standalone development but an extension to an existing nuclear power station comprising Sizewell A and B. The existing site and especially the buildings of Sizewell B have come to form a recognisable landmark within the Suffolk Coast & Heaths AONB.
- 3.2.2 The main visible elements of the existing Sizewell site which are evident from the wider landscape to the north and south comprise:
- the concrete rectilinear structure of Sizewell A
 - the white dome of Sizewell B which sits on top of a large blue rectilinear building forming a 'pedestal'.
- 3.2.3 Whilst there are other built structures associated with the existing site it is the relationship between these key buildings which form the principle composition of the site as seen and perceived from the wider AONB.
- 3.2.4 Irrespective of whether Sizewell is regarded as a positive or negative element of the AONB, it nonetheless forms a key landmark from the wider landscape. The colour range of the existing built structures has weathered into largely harmonious relationship with the surroundings, with the exception of the Sizewell B dome which maintains its sharp contrast of tone, lending it immediate recognition, along with its form from a wide range of viewpoints. The singularity of form, purity of hue and fine reflective finish has the potential to defy an easy assessment of scale.

Indeed, perception of the nature and scale of the dome alters with sky colour, angle of sunlight and viewpoint, furthering the enigmatic and iconic status of the structure.

3.2.5 The qualities of the existing Sizewell site can be summarised as including:

- The **distinctive form** of the Sizewell B dome which is unmistakable
- The position of the three key principle structures form a **balanced composition**.
- The **compact** nature of the site when viewed from the north or south
- The **light colour and reflective quality** of the Sizewell B dome
- The **muted colours** of Sizewell A and base of Sizewell B
- The **scale and simple shape** of the key buildings and lack of scale comparators
- The **solid and static form** of the buildings with distinct lack of activity as perceived from outside.
- **Remote location**, set within a wider natural landscape

3.2.6 These characteristics mean that Sizewell has an enigmatic quality, an unworldliness which is unfamiliar and intriguing. The existing development sits within its wider landscape setting and is experienced within a wider landscape context thereby adding something to the qualities and experience of the AONB. **Any new development of the site should seek to retain these qualities and relationship with the wider AONB as well as conserve and enhance the wider special qualities of the designation.**

4 Review of Stage 3 Consultation Documentation

4.1 Mapping and Presentation of Data

- 4.1.1 Volume 3 Figures 2.2.1 to 2.2.11 are provided in support of the landscape and visual effects of the proposed development.
- 4.1.2 Given the AONB's national importance, a number of the drawings would benefit from including the AONB boundary. This would enable easy and quick reference to character types within the AONB, Zone of Theoretical Visibility (ZTV) and thus the extent of AONB likely to receive views of the development, as well as those key viewpoints which fall within the designation.
- 4.1.3 Furthermore, where significant effects are predicted within a specific radius of the proposed development (e.g. within 2.5 or 5km of the main development site), these anticipated limits of significant effect should also be marked on the drawings. This would visually illustrate those landscape which fall within the area of predicted significant effect.
- 4.1.4 Additional ZTVs should be prepared for different components of the scheme especially major components of the construction phases which are likely to give rise to wider landscape and visual effects e.g. tree removal, four storey buildings within the accommodation campus, cranes, and soil storage areas. These ZTVs would help illustrate the extent of effects arising from different aspects of the scheme.
- 4.1.5 On this basis it will also be important for visualisations to reflect the in-combination effects and for the visualisation to include elements of the construction phases and not just the scheme during operation.
- 4.1.6 ***The above amendments and additions to the drawings and illustrative material should be provided within the LVIA to assist with understanding the nature and extent of landscape and visual effects.***

4.2 Significant Effects

- 4.2.1 Volume 2 of the Consultation Documents highlights significant adverse landscape and visual effects associated with the main development site are likely to be felt up to 2.5km and 5km.
- 4.2.2 Adverse effects of the proposed development on the AONB landscape are likely to arise as a result of one or more of the following:
- The ***loss of iconic built form and enigmatic qualities*** as a result of additional new buildings which obscure views to Sizewell B and lack iconic form in themselves.
 - The ***scale and massing of the buildings*** - notably the outline of the turbine halls and reactor domes which will affect the current composition of buildings at Sizewell and perceived extent of development at the site when viewed from the north and south.
 - The ***physical fragmentation of the AONB*** landscape as a result of the extension of the site – the AONB will in effect become two parts.
 - The ***loss of tranquillity and erosion/disturbance*** as a result of construction and increased numbers of people likely to be utilising the AONB as a local resource.

- The **urbanisation of the setting** of the AONB and visual intrusion from development beyond its boundary.

4.2.3 ***It is likely that the Sizewell C will have significant landscape effects on the AONB beyond the predicted 2.5km radius of the site. To the south significant effects are likely to be felt within 6km of the site and to the north significant effects are likely to extend further due to the line of the coast and orientation of views.***

4.3 Assessment of ‘in combination’ effects

4.3.1 The proposed development at Sizewell is complex and comprises many different elements such as the access road, green rail route, temporary accommodation, pylons and construction infrastructure and storage areas. The Stage 3 consultation documents discuss different aspects of the development in turn, and the landscape effects are considered separately for each. However, these different elements of the scheme may be experienced in combination with each other either from the same landscape or view or experienced sequentially along a key route. In particular, there may be in combination effects of different aspects of the construction phase.

4.3.2 ***It will be important therefore that the LVIA considers the ‘in combination effects’ when assessing physical, perceptual and visual effects on the receiving landscape, both during construction and operation of the site.***

4.4 Proposed Mitigation

4.4.1 Having acknowledged residual significant adverse effect on landscape character, views and special qualities of the AONB, the Landscape and Visual section of Vol 2 concluded no further mitigation (pages 18-19). This is surprising given that GLVIA sets out the need to offset, remedy and compensate for significant adverse effects where they cannot be avoided. Furthermore, GLVIA recommends enhancement (para 4.35-4.37) which is especially relevant to AONB landscapes where the purpose of designation is to conserve and enhance.

4.4.2 Mitigation appears limited to within the EDF Estate and does not incorporate proposals for off-site mitigation.

4.4.3 ***Looking beyond the red line boundary may present opportunities to reduce the effects of the proposed development from the wider AONB as well as opportunities to enhance the wider AONB landscape and should be considered within the LVIA and landscape mitigation strategy.***

4.4.4 Various strategies (i.e. for landscape, lighting, rights of way and access, recreation and amenity, and biodiversity) are noted in the Stage 3 Consultation documents along with reference to the provision of ‘funds’ including tourism, and community. There appears to be little consideration of how these various strategies and funds relate. However, given the proposed scheme is within the AONB and that there will be significant residual effects on the AONB landscape, it is important that mitigation strategies and funds further the purposes of AONB designation.

4.4.5 ***The purpose of AONB designation, i.e. conserving and enhancing the Natural Beauty of the area, should be an overarching objective in mitigation measures and deployment of***

funds – opportunities should be sought to deliver multi-functional benefits at a landscape scale.

4.5 Proposed use of Colour in Buildings

- 4.5.1 There is currently insufficient detail to thoroughly assess the proposed finishes and colours for Sizewell C. However, such information as is available indicates weaknesses in integration with the local context. In particular, the use of a single colour applied across the main elevations of both turbine halls leads to a lack of articulation to any part of the building replacing simplicity of form with unremitting blandness. No attempt to minimize the perceived scale and massing of the buildings through varied use of tone and the scheme has little relationship with the colour and finishes of Sizewell A and B.
- 4.5.2 ***Further detailed mitigation associated with the main buildings on the site will need to be developed to more effectively reflect the local context of the site and existing buildings.***
- 4.5.3 ***Opportunities to better integrate colour into the proposed scheme includes a fuller understanding of the local colour context. An initial assessment of this has established the following principles:***

- Use a ***palette of related colours*** to achieve resonance with the receiving landscape
- Deploy ***colour and tone to articulate*** the elevations and influence perceptions of scale
- Use ***darker tones*** at the base of the building to ***“ground” the structure*** as low as possible
- Use ***lighter tones*** at the top of the buildings to reduce contrast with the sky and ***lose some of the perceived weight and mass*** of the building
- Make ***references to the rhythms and lie of the landscape*** in proportioning and shaping colour applications
- Attempt to ***animate the buildings at close quarters*** through implied rhythm or movement. For example, using layered mesh in front of elevations can create a moiré effect which is dependent upon the movement of the viewer without affecting the simplicity of the building. This dynamic recalls the movement of grasses in the wind.
- Acknowledge the presence of adjacent buildings through colour reference, in order to ***create dialogue between structures*** e.g. the reactor buildings proposed for Sizewell C, whilst very different in form to the iconic Sizewell B could be constructed using white cement to clarify their purpose.
- Be aware of the ***influence of distance on colour*** in the perception of buildings in the landscape. Tonality changes little over distance whilst hue tends to “blue” and can be difficult to read. Tonality is critical in reading form from a distance. ***Maintaining a clear difference in tonality between significant landmarks*** is important if forms are not to merge and become indistinct. This is particularly the case where views to the dome from the north will be partly obscured by the proposed Sizewell C.

4.6 Cumulative Effects

- 4.6.1 The Stage 3 Consultation Volume 2b lists in table 13.3 developments which are likely to give rise to cumulative effects. Whilst EA1 North and EA2 are mentioned focus is on the onshore elements of the development.
- 4.6.2 ***The effect of off shore wind farm development on the AONB coast, in areas which will also be affected by the Sizewell C proposals, should be considered under cumulative effects. Significant adverse cumulative effects are likely to extend between Orford Ness and Southwold, where all three schemes would potentially be experienced.***

Appendix 1: Colour Palette Sheets

Existing Colour Context

The context for the proposed development is illustrated in the colour palette sheets. The succession of features from sky to sea, shingle to dunes, footpath to densely vegetated mound, provides a distinctive and varied textural colour range unique to this coast.

Sizewell 'C' site Existing palette



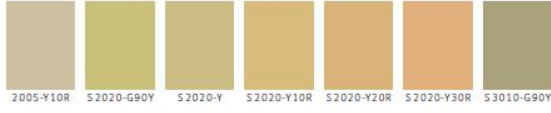
The colours above indicate the dominant hues and tonality of the site context, comprising the natural landscape and built form.

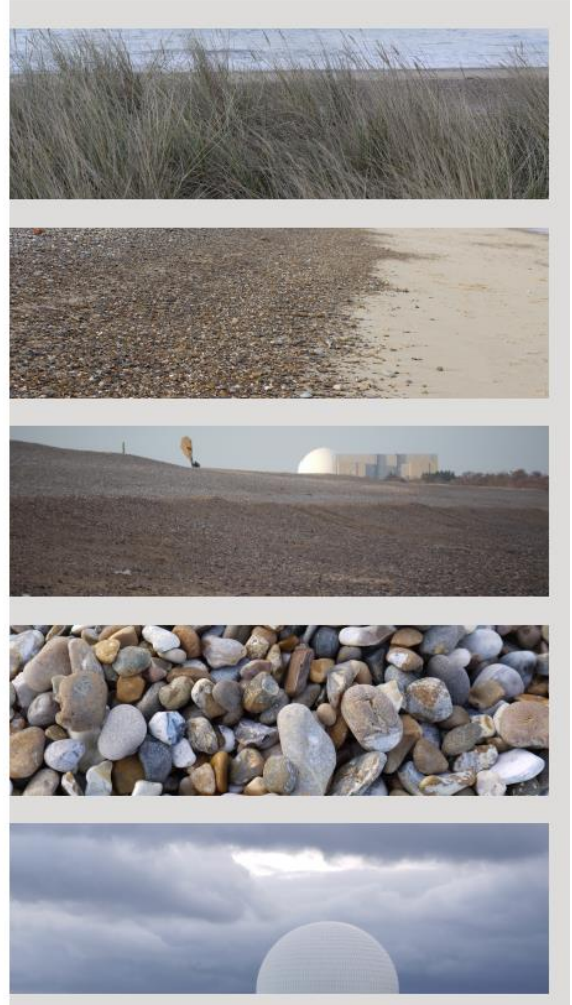
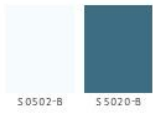
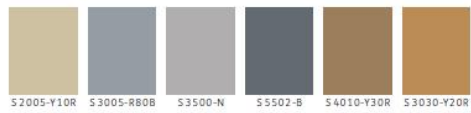
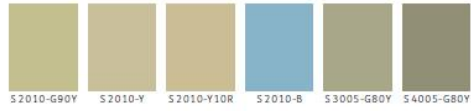
This palette indicates the nuance of the natural landscape whilst the photographs also illustrates some of the textures and rhythms associated with it.

The AONB colour guidance offers further insight into the colour ranges associated with the sand dunes and shingle ridges and coastal lowlands landscape character types.

The existing palette is the basis for a developed palette that will take account of the proposed built form and the potential to articulate and modulate the elevations, influencing the perception of scale and mass. The developed palette must also take account of the effect of distance and light reflection on new finishes.

Using an environmental colour assessment to guide selection of colours and finishes will assist in the process of integrating new development into its site context. The scale of the proposed development is such that a clear statement of design intent is required to ensure clarity and consistency of outcome.





Appendix 2: Summary of Key Concerns

Policy Context

No information has been provided regarding refinement of the design of the main site in terms of building scale, orientation, position in order to reduce wider landscape effects on the AONB. Given the national importance of the AONB, and requirement of the IPC to weigh up the benefit of design refinements to reduce adverse effects against any loss of functionality, it is considered essential this iterative design process is considered and presented in the Environmental Statement (ES) and Landscape and Visual Impact Assessment (LVIA).

Designation History and Special Qualities

The Natural Beauty and Special Qualities report nor the information contained in Volume 2 consultation documents, fully reflect special qualities at a local level.

Further consideration of special qualities at a local level within the 15km study area should be presented within the LVIA.

Existing Colour Study

The Stage 3 consultation documents do not make reference to the AONB colour study. This represents a missed opportunity to reduce the impact of the proposed development on the AONB. The colour study provides vital base line information and sets out a methodology for assessing and developing palettes which will at the minimum establish a connection between the new structures and the receiving landscape.

Special Qualities

The special qualities of the landscape at a local level will inform susceptibility and sensitivity of the landscape to the proposed development and will need detailed consideration within the LVIA.

Given the special qualities of the AONB, it will be important that landscape effects consider the interrelationship between landscape types and effects of the proposed development on perceptions and views where landscape types interrelate.

Character of the Existing Sizewell Site

The characteristics and qualities of the existing Sizewell site means that it has an enigmatic quality, an unworldliness which is unfamiliar and intriguing. The existing development sits within its wider landscape setting and is experienced within a wider landscape context thereby adding something to the qualities and experience of the AONB. Any new development of the site should seek to retain these qualities and relationship with the wider AONB as well as conserve and enhance the wider special qualities of the designation.

Mapping and Presentation of Data

It is recommended that amendments and additions are made to the drawings and illustrative material within the LVIA to assist with understanding the nature and extent of landscape and visual effects on the AONB.

Significant Effects

It is likely that the Sizewell C will have significant landscape effects on the AONB beyond the predicted 2.5km radius of the site. To the south significant effects are likely to be felt within 6km of the site and to the north significant effects are likely to extend further due to the line of the coast and orientation of views.

Assessment of “in combination” Effects

The proposed development at Sizewell is complex and comprises many different elements.

It will be important therefore that the LVIA considers the ‘in combination effects’ when assessing physical, perceptual and visual effects on the receiving landscape, both during construction and operation of the site.

Proposed Mitigation

Looking beyond the red line boundary may present opportunities to reduce the effects of the proposed development from the wider AONB as well as opportunities to enhance the wider AONB landscape and should be considered within the LVIA and landscape mitigation strategy.

The purpose of AONB designation, i.e. conserving and enhancing the Natural Beauty of the area, should be an overarching objective in mitigation measures and deployment of mitigation ‘funds’ – opportunities should be sought to deliver multi-functional benefits at a landscape scale.

Proposed use of Colour in Buildings

Further detailed mitigation associated with the main buildings on the site will need to be developed to more effectively reflect the local context of the site and existing buildings.

Opportunities to better integrate colour into the proposed scheme includes a fuller understanding of the local colour context.

Cumulative Effects

The effect of off shore wind farm development on the AONB coast, in areas which will also be affected by the Sizewell C proposals, should be considered under cumulative effects. Significant adverse cumulative effects are likely to extend between Orford Ness and Southwold, where all three schemes would potentially be experienced.

The proposals as they are consulted on would have a significant adverse impact on the AONB and are not appropriate for a nationally designated landscape.

Yours sincerely



Simon Amstutz
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