

Sizewell Nuclear New Build
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By email only

17 Jan 2013

Dear Sizewell Nuclear New Build

Stage 1 Pre Application Consultation on Sizewell C

Summary of Response

The response below to this consultation is from the Suffolk Coast and Heaths AONB Partnership. The Partnership recognises that the development could bring economic benefits to the area but the developer should recognise that the development proposals are in a nationally protected landscape and therefore should be an exemplar of how a nationally significant infrastructure project can be accommodated in a sensitive landscape. The comments below seek to suggest how to meet this aim.

The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Partnership has seen the documents relating to the stage 1 Pre Application Consultation on a proposed new nuclear development, Sizewell C.

The development proposals are of particular interest to this Partnership as they fall within the nationally protected Suffolk Coast and Heaths AONB. The Partnership, a non constituted body, is made up of local authorities and environmental, business and agricultural organisations. This response is sent on behalf of the Suffolk Coast and Heaths AONB Partnership and the individual organisations that make up this Partnership may wish to make their own response to the consultation to reflect their individual organisations remit and aims.

Section 85 of the Countryside and Rights of Way Act (2000) places a duty on all relevant authorities to have regard to the objectives of AONBs, ie to conserve and enhance the AONB.

The Partnership recognises paragraph 115 in the National Planning Policy Framework (NPPF) that states 'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'.

The Partnership recognises that the development could provide positive opportunities for the area, in terms of economic development, but notes that it is inevitable that there will be adverse impacts on the areas landscape character, tranquillity and visual amenity.

The Partnership notes that these development proposals are for the only nuclear new build in a protected landscape in the United Kingdom. The Partnership considers that as the proposals are for major development within a protected landscape they should act as an environmental

exemplar and that the developer should take note of the location of its proposals and deliver something that will ensure a positive legacy for the AONB.

The Partnership wishes to make the following observations on the proposals and options:

1. Construction and temporary development

The Partnership notes a proposal for a significant amount of land near the power station to be used for construction purposes. The Partnership understands that the proposed land take has increased and this has been agreed by Department of Energy and Climate Change (DECC).

The Partnership raises the following concerns about this proposal:

- The proposed land required will cut the nationally protected AONB in half at this, the narrowest point of the AONB.
- There will inevitably be amenity, tranquillity, access and biodiversity losses due to this proposal during the 10 years of construction.

The Partnership asks Nuclear New Build, EDF Energy the following questions:

1. What is the justification for this significant and increased land use proposal?
2. Given that the nuclear platform is half the size of that at Hinckley why is the construction and development site at Sizewell bigger than the one required for Hinckley?
3. What proposals do Nuclear New Build, EDF Energy have for mitigating and offsetting the losses during the construction period?

2. Visitor Centre

The Partnership welcomes the proposal for a visitor centre to interpret the facility to visitors and residents. The partnership consider that as a new build within the nationally protected AONB then the facility should be designed as an exemplar for design, environmental performance and interpretation.

The Partnership makes the following comments on the proposed Visitor Centre:

1. The proposed site at Lover's Lane is considered inappropriate development within the AONB. The justification for this view is that the location is set apart from the development site and would have the potential to undermine businesses in Leiston.
2. It is considered that the Goose Hill site is the most appropriate location as the site affords views over the development site and any associated car park could be screened by existing woodland.
3. If this site is unavailable in the short term we would suggest a temporary facility at the proposed Sizewell Beach location but avoid commercial competition with any existing facilities at this location.
4. The Visitor Centre should be an exemplar for design, environmental performance and interpretation.

3. Development Site Campus

The Partnership recognises the need for a development site campus and would promote a development that minimises adverse biodiversity, landscape and economic impacts while seeking to promote opportunities for improved facilities during construction and as a legacy.

The Partnership makes the following comments on the proposed campus sites:

Option 1:

The Partnership considers a development at this location to be inappropriate as:

1. The site is part of a bat habitat for Barbastelle, a bat protected by the European Habitat Directive. This species is particularly susceptible to light, which this proposed development would inevitably cause. Any development at this site would need to offset the damage to the bat habitat to a level compliant with the European directive.
2. It creates further development pressure on the edge of the AONB.

Option 2:

The Partnership considers a development at this location to be inappropriate as:

1. The development would cause similar light pollution and disturbance issues as outlined in option 1 above.
2. It is inappropriate development within the nationally protected AONB.

Option 3:

The Partnership considers this the best option as it is in a suburban location as:

1. The 'construction' community will have better access to facilities in Leiston and this could bring economic benefits to the area.
2. There is less impact upon the visual amenity of the AONB.
3. The proposed site is not within the open countryside.
4. There are greater opportunities for legacy options for Leiston.

4. Park and Ride

The Partnership has limited comments to make on the Park and Ride options given the nature of the proposed developments and the Partnership's remit. The Partnership considers that any Park and Ride site should be outside the AONB as it is not appropriate development for an AONB and that option 2 is the best option in terms of sustainable transport.

The Partnership has considerable concerns on transport in general. The development will inevitably create a considerable amount of traffic during construction and a legacy of increased traffic during its operation phase. The Partnership considers that the development should seek to mitigate and offset traffic concerns. AONB businesses depend to a large extent on the reputation of the area as a good place to visit and take holidays. The development is likely to damage this reputation through a real or perceived problem of traffic congestion and road safety issues, and the Partnership consider that New Nuclear Build, EDF Energy should take measures to allay these problems and fears by means of mitigation.

5. Rail improvements

The Partnership consider the proposal to reduce the delivery of freight by road by means of moving freight by rail to be sound, however careful consideration of how this can be achieved is required.

Option 1: New rail terminal:

The Partnership considers that the new rail terminal is a better option. The Partnership would urge that the developers consider developing this new rail terminal for passengers as well as freight.

Option 2: Temporary rail extension:

The Partnership considers this option to be poor as:

1. It brings the further development into the AONB.

2. It brings development into the habitat of the Barbastelle bat and would need to be offset to a suitable level as indicated by the European directive.
3. The proposals would cut the AONB in half at the narrowest point of the AONB.

6. Lorry Park

The Partnership notes that the proposed lorry parks are in or adjacent to the AONB. The Partnership would make the following comments on the proposals:

Option 1: Orwell Lorry Park (West)

The Partnership notes the need for use of land in the AONB for this option to facilitate the connection to the A14.

Option 2: Orwell Lorry Park (East)

The Partnership notes that this is for a proposal within the AONB and has a footpath running through it. Any use of this location would need to offset the damage to the AONB.

Option 3: A12/A14 Seven Hills

The Partnership notes that this option is outside the AONB, but within the setting of the AONB, and considers it inappropriate development in the open countryside.

This response is on behalf of the Suffolk Coast and Heaths AONB Partnership that reflects the views of the Partnership. Members of the Partnership may submit individual responses reflecting the full remit of their individual organisation.

Yours sincerely



Cllr David Wood
Chairman of the Suffolk Coast and Heaths Partnership