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 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'.

2.1.3 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.

2.1.4 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.

2.1.5 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).

2.1.6 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.

2.1.7 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 Hinckley 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.

2.1.8 ***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 functionally, 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 England[1]) and the second considered factors termed 'special qualities'. These latter factors are not however special qualities as defined by Natural England[2] 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.***

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***

[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

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.
- Thropeness 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 concreate 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. Whist 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.

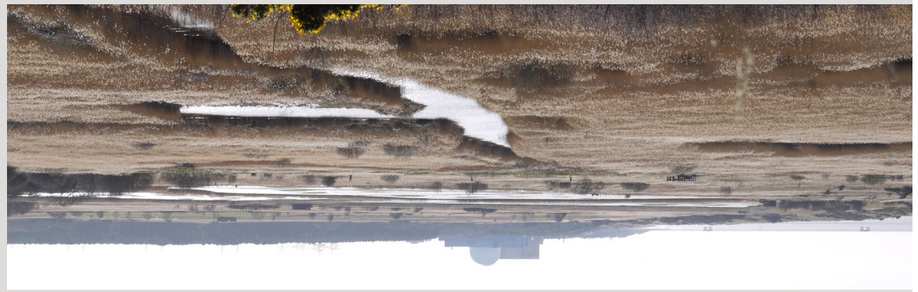
2005-Y10R
S 2020-G90Y
S 2020-Y
S 2020-Y10R
S 2020-Y20R
S 2020-Y30R
S 3010-G90Y

S 1005-Y20R
S 2010-Y
S 3010-R80B
S 3010-R90B

S 0502-Y
S 1002-Y50R
S 2005-Y20R
S 3010-Y20R
S 4020-R90B

S 2002-G
S 2020-Y20R
S 3010-Y40R
S 6005-Y20R
S 5500-N

S 4005-Y50R
S 5005-Y50R
S 5010-Y10R
S 6005-Y80R
S 6020-G70Y



S 0502-B
S 5020-B

S 2005-Y10R
S 3005-R80B
S 3500-N
S 5502-B
S 4010-Y30R
S 3030-Y20R

S 0500-N
S 3005-Y20R
S 5005-Y20R
S 5010-Y50R

S 2005-Y50R
S 3005-Y50R
S 4010-Y30R
S 5005-Y50R

S 2010-G90Y
S 2010-Y
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S 2010-B
S 3005-G80Y
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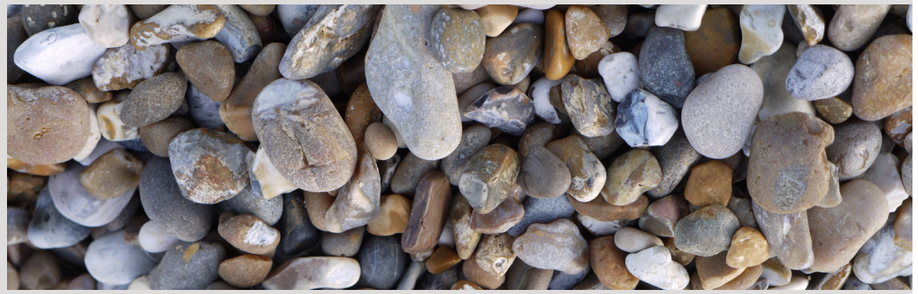

Appendix 2: Summary of Key Concerns

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 functionally, 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.