

This representation is made on behalf of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership. The Partnership is made up of around 25 organisations who are committed to the purposes of the AONB designation, to conserve and enhance natural beauty. **For the avoidance of any doubt, some individual members of the Partnership are public bodies or statutory undertakers who have duties to conserve and enhance natural beauty and it is anticipated these members will provide separate representations reflecting their complete interests and responsibilities. Other Partnership members are likely to make their own representations reflecting their purposes.**

The AONB Partnership's main concerns are summarised below:

- 1) Impact on the statutory purpose of the AONB, to conserve and enhance natural beauty. The natural beauty and special qualities of the AONB have been identified and agreed by EDF Energy, the AONB partnership, Suffolk County Council and Suffolk Coastal District Council (now East Suffolk Council).

The AONB Partnership has requested from EDF Energy an analysis of the impacts of the development on the defined natural beauty and special qualities several times during the four rounds of consultation and at various workshops and is pleased to see this analysis contained within the documentation, although disappointed that it has not been advised of it, nor been invited to comment on the analysis before this stage of the DCO process.

The developer acknowledges significant long term adverse effects to the AONB natural beauty and special qualities as expressed in the agreed natural beauty and special qualities document therefore to the statutory purpose of the AONB. Further thoughts from the AONB Partnership on the acknowledged impacts on the defined natural beauty and special qualities will be progressed during written representations.

The AONB Partnership does not consider that EDF Energy have addressed, or have seen any explicit reference to all the areas of concern raised in earlier rounds of consultation and maintains its concern that the developer is not paying due regard to the statutory purposes of the AONB.

- 2) The AONB Partnership do not concur, in the strongest possible terms, with EDF Energy's apparent approach to the impacts on the AONB. Throughout, the analysis of the impacts of the construction, operation and decommissioning phases of the proposed development references are made to impacts in a 'limited area' of the AONB, for example at page 110 6.3 Volume 2 13.149:

*In conclusion, there would be significant effects from construction on the natural beauty indicators and special qualities of the AONB over a limited extent of the designation. However, the overall integrity and resilience of the wider designated landscape would not be compromised and the wider countryside especially west of the construction area, would continue to support the AONB's general countryside characteristics.*

**The AONB is a single entity. Therefore, impact to one section of the AONB impacts the statutory purpose of the AONB. The integrity and resilience of the AONB and its statutory purpose is compromised when part of it is negatively impacted to such a degree.**

This point is acknowledged in the National Policy Statements that reflect that there will be damage to the statutory purpose of the AONB from a proposed new nuclear power station at Sizewell.

Furthermore, in the statement reproduced above, the phrase 'AONB's general countryside characteristics' does not appear to acknowledge the national landscape designation and defined natural beauty and special qualities.

The development will have a significant impact on the AONB, in effect cutting it in two during the proposed 12 years of construction.

The introduction of the Sizewell link road brings development into the AONB that does not conform with its statutory purpose. The AONB Partnership would wish to see EDF Energy demonstrate how the proposals meet the statutory purpose of the AONB, to conserve and enhance natural beauty. In addition, the proposed link road will permanently split the AONB in two and negatively impact on the setting of the AONB.

- 3) The AONB Partnership acknowledges and welcomes that EDF Energy have stopped referring to the AONB designation as a 'local' designation as it had been doing during the consultation phases, despite representations from the AONB Partnership to seek acknowledgement from the developer that the designation is a national designation and has a statutory purpose.

However, the AONB Partnership considers that the linking of the AONB designation to that of the Heritage Coast is misleading. There are multiple occurrences of this throughout the documentation, for example at page 22 6.3 Volume 2 13.4:

*to the natural beauty and special qualities of the Suffolk Coast and Heaths AONB/Suffolk Heritage Coast.*

The AONB Partnership considers that the two designations should be treated separately and the impacts on the purposes of each of the designations should be undertaken in recognition of each of their defined purposes.

- 4) The AONB Partnership considers that several concerns raised during the consultation phases and engagements with EDF Energy have not demonstrated regard to the purposes of the AONB in the current application documents. These include:

- Impact of the Sizewell B relocated facilities on the AONB as described on page 70 6.3 Volume 2 13.6.8 of the documentation that states:

*The assessment concluded that the Sizewell B relocated facilities works on their own would result in **no significant effects** on the assessed receptors [Document emphasis]. The AONB partnership does not concur with this view.*

- The design of the operational facilities. The AONB Partnership note that the Environment Statement acknowledges there is only limited scope for design of the proposed development due to health and safety considerations and to a limited degree the sites physical constraints. It further notes that much of the design is lifted and shifted from Hinkley Point C.

The AONB partnership considers that this does not recognise the different situation of the proposed Sizewell C development. Sizewell C is proposed to be

built in a nationally designated landscape and the proposed design fails to meet the statutory purposes of the AONB, to conserve and enhance natural beauty.

It is recognised that EDF Energy employed the Design Council to undertake a review of the design approach. The AONB Partnership do not concur with the findings of the work. It considers that the work focused primarily on building design, architectural merit and operational functionality and did not give enough weight to the location and setting of the site within an AONB, nor did it recognise the significance of the construction phase impacts on the AONB and impacts on the AONB qualities of the wider EDF Energy estate.

5) The AONB Partnership do not concur with the analysis of the cumulative impacts of the proposed development on the AONB. The proposals will:

- Negate the mitigation of the careful simple design of Sizewell B.
- Negate the screening effect of Sizewell A by Sizewell B.
- Extend the relatively contained nuclear complex by doubling its size.

The AONB Partnership considers the cumulative impacts of proposed and existing infrastructure appear to have been underplayed when taken into combination in relation to the statutory purpose of the AONB. Other proposed and existing Nationally Significant Infrastructure in the area include:

- ScottishPower Renewables East Anglia Two offshore wind project
- Scottish Power Renewables East Anglia One North offshore wind project
- National Grid Venture's Nautilus interconnector
- National Grid Venture's Eurolink interconnector
- National Grid Venture's Suffolk to Kent link
- Innology Five Estuaries project
- Other projects coming through the Crown Estates Round 4 auction

And existing major infrastructure including:

- Sizewell A
- Sizewell B
- Greater Gabbard offshore wind array and associated on shore infrastructure
- Galloper offshore wind array and associated on shore infrastructure

6) The AONB Partnership consider the introduction of new pylons into the nationally designated landscape is unacceptable. The AONB Partnership makes the following comments in relation to the pylons:

- Introduced pylons will have a significant negative impact on the statutory purposes of the AONB.
- It is not convinced that all alternatives to the introduction of pylons into the AONB have been fully explored.
- It is inappropriate to introduce new pylons into a nationally designated landscape when Ofgem are promoting a scheme to enhancement of visual amenity in National Parks and AONBs affected by National Grid transmission infrastructure. In England this is via the National Grid Visual Impact Provision scheme. This proposed scheme introduces more pylons into the AONB while at the same time the Ofgem allowance is paying for the undergrounding of transmission lines in other nationally designated landscapes.

- 7) The AONB Partnership consider that the impacts on the tourism industry in the AONB, worth £228M pa in 2019, have not been properly acknowledged or mitigated. The AONB is the 'canvas' for the tourism industry to operate successfully and a 12 year construction phase has the potential to negatively impact that industry as demonstrated in the Suffolk Coast Destination Management Organisation/AONB study in 2019. The study showed that 29% of those polled would be a lot less or a little less likely to visit the Suffolk coast having been made aware of energy project proposals.
- 8) The AONB Partnership considers that the construction phase impacts have been underrepresented:
- Observation of recent major infrastructure projects, e.g. Flamanville and Olkiluoto indicate that the duration of the construction period cannot be guaranteed and there is high potential/probability of the construction phase extending beyond the anticipated period. Flamanville nuclear power station extended the construction period to 13 years in March 2017, a 15 month delay at Hinkley Point C and Olkiluoto (many years behind schedule).
  - The AONB Partnership further consider that the EDF Computer Generated Imagery are not fit for purpose to give a visual representation of the impacts of construction and that work similar to that provided for Wylfa should be undertaken.
- 9) The AONB Partnership considers the loss of part of the Site of Special Scientific Interest unacceptable, particularly as such designated sites are in the defined natural beauty characteristics (as agreed by EDF Energy, the AONB Partnership, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council] and statutory purposes of the AONB. It is further concerned that the impacts of the current proposals for crossing the Site of Special Scientific Interest will have a significant impact on the defined characteristics of the AONB including:
- Landscape (Landscape Quality, Scenic Quality AONB defined indicators)
  - Biodiversity (Landscape Quality, Natural Heritage features AONB defined indicators)
  - Functioning Ecosystem (Ecosystem Goods and Services AONB defined indicators)
  - Landscape Character (Landscape Quality, Scenic Quality AONB defined indicators)
- 10) The AONB Partnership considers that the proposed causeway will introduce an unacceptable level of development into the AONB and does not meet the statutory purposes of the AONB and will have significant negative impacts on the defined natural beauty and special qualities of the AONB (as agreed by EDF Energy, the AONB Partnership, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council]) such as:
- Landscape (Landscape Quality, Scenic Quality AONB defined indicators)
  - Biodiversity (Landscape Quality, Natural Heritage features AONB defined indicators)
  - Functioning Ecosystem (Ecosystem Goods and Services AONB defined indicators)
  - Landscape Character (Landscape Quality, Scenic Quality AONB defined indicators)
- 11) The AONB Partnership considers the proposed access road causes unacceptable negative impact on the defined natural beauty and special qualities of the AONB (as agreed by EDF Energy, the AONB Partnership, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council]) and the statutory purposes of the AONB, in particular:

- Design during operation (Relative Wildness and Cultural Heritage AONB defined indicator)
  - Urbanisation and loss of character and urbanisation of the AONB (Landscape Quality, Scenic Quality, Scenic Relative Wildness and Cultural Heritage AONB defined indicator)
- 12) The AONB Partnership considers that if the proposed Green Rail Route is implemented that further consideration of avoidance and mitigation for the negative impacts on the AONB's defined natural beauty and special qualities of the AONB (as agreed by EDF Energy, the AONB Partnership, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council]). Furthermore, the route of the line should be reinstated at the earliest opportunity.
- 13) The AONB Partnership considers the night-time impacts of the development have not been appropriately assessed against the AONB criteria. A baseline that includes impacts of light emanating from Sizewell A and Sizewell B should not be used as these are temporary structures and not representative to the background light of the AONB.
- 14) The AONB Partnership considers that the location of an outage car park in the AONB is inappropriate, unnecessary and does not meet the purposes of the AONB. The AONB Partnership does not consider that the case for siting the outage car park within the AONB has been sufficiently made and that alternatives outside the AONB have not been given appropriate consideration in relation to impacts of the proposals on the AONB.
- 15) The AONB Partnership has concerns relating to the loss of public access via public rights of way and open access areas. This loss of access will compromise the experience for those using such routes or areas and the experience of the AONB. There is particularly high negative impact on the Suffolk Coast Path/proposed England Coast Path. The loss of public access (via public rights of way open access areas) and a compromised experience for those using such routes or areas the proposed mitigation is not satisfactory in meeting the statutory purposes of the AONB such as the defined natural beauty and special qualities of the AONB (as agreed by EDF Energy, the AONB Partnership, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council]) health and Wellbeing and Economy special qualities.
- 16) The AONB Partnership considers that the design of the accommodation campus does not pay due regard to the statutory purposes of the AONB. Although located outside the AONB this element is within the setting of the AONB and would have an impact on the AONB natural beauty and special quality characteristics as defined natural beauty characteristics (as agreed by EDF Energy, the AONB Partnership, Suffolk County Council and Suffolk Coastal District Council [now East Suffolk Council]) and statutory purposes of the AONB. This will include the Relative Tranquillity and Relative Wildness indicators.
- 17) The AONB Partnership have concerns about the approach to coastal issues, it questions the developer's approach and considers it does not pay due regard to the statutory purposes of the AONB as communicated by the agreed Natural Beauty and Special Qualities document in relation to:
- The visual impact of the Beach Landing Facility
  - Access impacts caused by the Beach Landing Facility
  - The treatment of the AONB during the decommissioning of the coastal defences

- The impact on the landscape and scenic quality of the AONB of the coastal defences during their maintenance and operation (eg the exposure of hard sea defences during this time)

18) The AONB Partnership recognise the wording in the National Policy Statement (EN-6), C.8.73, that states:

*Therefore, the Appraisal of Sustainability has found that there is 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.*

It therefore considers that if the development goes ahead then compensation to the damage caused to the AONB be made in the form of compensation payments to further the statutory purpose of the AONB and deliver work to support the aspirations of the statutory AONB Management Plan. Such funds should reflect the impacts caused by the development during the construction, operation and decommissioning on the AONB. The AONB Partnership considers projects delivered through any compensation fund should at least consider the view of the AONB Partnership through a mutually agreed mechanism.

The AONB Partnership's further developed concerns relating to impacts on the statutory purpose of the AONB and the agreed Natural Beauty and Special Qualities document will be outlined during via Written Representations at the Public Examination.

**The AONB Partnership cannot support the development proposals in the current form due to the unacceptable level of negative impact on the nationally designated landscape.**