

Suffolk Coast & Heaths AONB Partnership (IP20025669) response to Examination Authority Questions TWO

ExQ2	To:	Question:	AONB Partnership Response
LI.2.1	SCC, ESC, Natural England, The AONB Partnership, National Trust, Stop Sizewell C, TASC	<p>Additional Construction Visualisations Additional illustrative day and night-time construction photomontage visualisations are to be produced from four Representative Viewpoints [REP5-117]. Please comment on the suitability of the selected locations.</p>	<p>The AONB Partnership welcome additional day and night-time photo montage visualisations to support the understanding of the impacts of the construction phase of the Sizewell C project. It considers that the additional visualisations will improve understanding on the defined qualities of the nationally designated AONB such as tranquillity, landscape quality and scenic quality.</p> <p>However, it considers that further I visualisations from:</p> <ul style="list-style-type: none"> • R6 Suffolk Coast Path east of Goose Hill • R8 Footpath north of Leiston Abbey • R24 Leiston Abbey (from top of ruins) [NB R25 appears to be same location in 6.3 Volume 2 main Development Site Chapter 13 Landscape and Visual table 13.13] • R16 RSPB Minsmere (Whin Hill) • R26 1,800m directly east of Sizewell power stations • R29 Sandlings Walk at Home Farm <p>would provide further and better understanding of the impacts of the proposals.</p>
LI.2.7	ESC, SCC, Natural England, The AONB Partnership, Stop Sizewell C, TASC	<p>SSSI Crossing – Design Amendment Please review the amended SSSI crossing design [REP5-010] and provide comment.</p>	<p>The AONB Partnership consider that the information provided in REP5-010 to be insufficient to assess the impact on the nationally designated AONB. It considers a Landscape and Visual Impact Assessment is required to fully understand the impacts on defined features such as landscape quality, scenic quality and tranquillity. Natural heritage features are a defined quality of the AONB and the loss of part of an irreplaceable Site of Special Scientific Interest does not support the purpose of designation or contribute to wildlife recovery.</p>

			<p>Reviewing the limited detail in REP5-010 <i>The Sizewell C Project 2.5 Main Development Site. Permanent and Temporary Beach Landing Facility and SSSI Crossing Plans</i>. The AONB Partnership make the following comments:</p> <ul style="list-style-type: none"> • Detail on the use of colour should be included in the plans that should draw on the AONB guidance on the selection and use of colour in development. • The embankments as shown in the plans do not reflect the natural AONB topography in this part of the nationally designated landscape and as such do not contribute to its statutory purpose. • The introduction of 3.5m ‘railings’ above the road surface introduce a significant increase in height of the man made structures into the AONB and do not contribute to the purpose of the AONB.
LI.2.9	The Applicant, ESC, Natural England, The AONB Partnership, Stop Sizewell C, TASC	<p>Alternative Outage Car Park Note Please review and comment on the content of the SCC submission [REP5-171].</p>	<p>The AONB Partnership note that Suffolk County Council is a member of the AONB Partnership. Consultation responses from the AONB Partnership are always caveated by the assumption that individual members of the Partnership will make their own responses reflected their full remit.</p> <p>AONB Partnership comments on Suffolk County Council comments are made in the context that Suffolk County Council is a funding partner and host of the AONB staff team. For information, AONB Partnership consultation responses for AONB are drafted by the staff team for</p>

			<p>partner comment, correction and endorsement before submission.</p> <p>The AONB Partnership broadly agree with the conclusions the Suffolk County Council draw in their deadline 5 response to the request for additional information requested by the Examining Authority on the proposals relating to the provision of an alternative car park (REP5-171) in paragraphs 19 and 20.</p> <p>However, the AONB Partnership consider that in paragraphs:</p> <p>10: Any further parking required for simultaneous outages should be located outside the AONB.</p> <p>12: That sites outside the AONB should be identified for occasional outage car park facilities.</p> <p>13: The applicant should seek to identify locations via the proposed 'call off' contracts outside the AONB.</p> <p>15: Any sites identified for additional outage car parks should be outside the AONB.</p> <p>The AONB Partnership takes this view as large scale car parks do not contribute to the statutory purpose of the nationally designated landscapes and reasonable alternative solutions are possible.</p>
LI.2.22	ESC, SCC, Natural England,	Design and Access Statement –Overarching Design Principles and Detailed Built Development Principles	<p>The AONB Partnership considers any amendments and additions still do not pay sufficient weight to the location of the proposed development, in and adjacent to a nationally designated landscape-see more detailed comments in</p>

	The AONB Partnership, National Trust	Several amendments and additions have been made to Tables 5.1 and 5.3 of the DAS [REP5-070]. Please review and comment on the amendments and additions.	response to the Examining Authorities question LI.2.23 below.
LI.2.23	ESC, SCC, Natural England, The AONB Partnership, National Trust	<p>Design and Access Statement –Overarching Design Principles</p> <p>In respect of Overarching Design Principles 17-21 [REP5-070], are you satisfied that the proposed design of the MDS meets the objectives of these principles?</p>	<p>The AONB Partnership considers that further refinement of the principles is required to meet their objectives. It make the following comments on the Overarching Design Principles 17-21 (REP5-070) reproduced and commented on below:</p> <p><i>17: Sizewell C will be an efficient and well-ordered facility. It will provide visible reassurance of a properly functioning and safe site, considerate of the area of environmental sensitivity.</i></p> <p>The AONB Partnership agree with the aspiration of this principle but consider it cannot be achieved when the design is a replica of the plant being built at Hinkley Point C so does not demonstrate the environmental sensitivity required as the proposed location of Sizewell C is in the nationally designated AONB.</p> <p><i>18 Sizewell C structures will complement the existing structures within the landscape, most notably Sizewell A and B, as far as reasonably practicable.</i></p> <p>The AONB Partnership does not consider the proposed Sizewell C structures would compliment Sizewell A or B as there is no continuity of design. Sizewell C will dominate Sizewell B and C and negate the simple embedded mitigation of design of Sizewell B. Furthermore, the introduction of new pylons, stacks and beach landing facilities into the area will negatively compromise the simple design of Sizewell B.</p>

			<p><i>19 Design will be a planned composition with Sizewell A and Sizewell B, balancing proportions and impacts across the sites, as far as reasonably practicable.</i></p> <p>The AONB Partnership do not concur that the planned composition with Sizewell A and B will be balanced by the design of Sizewell C. Sizewell C will cover twice as much AONB land and as Sizewell B, be significantly higher than Sizewell B, see development further east than Sizewell B, introduce much larger sea defences than Sizewell B indicating the current proposals are not of an appropriate scale for the AONB or in balance with the existing Sizewell A and B stations.</p> <p><i>20 The power station will be a master-planned composition as far as reasonably practicable, and not an unplanned series of individual buildings and structures.</i></p> <p>The AONB Partnership recognises the applicant's aspiration to masterplan the composition. However, the AONB Partnership consider the inability to connect to existing National Grid infrastructure underground and proposals to introduce new pylons that negate the ability of the proposals to be contained and introduce significant new structures into the AONB. Furthermore, the proposals for a temporary beach landing facility and a desalination plant for the 9-12 years duration of construction into the AONB to introduce a complex series of man made structures into the AONB that do not contribute to its statutory purpose of natural beauty.</p> <p><i>21 Design will utilise techniques to reduce the perceived scale of buildings from a distance by manipulating the size</i></p>
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LI.2.24	ESC, SCC, Natural England, The AONB Partnership, Theberton and Eastbridge Parish Council, Stop Sizewell C, TASC	<p>Design and Access Statement – Accommodation Campus Design Principles Please review and comment on the revised design principles contained within Table A.1 [REP5-075].</p>	<p>The AONB Partnership consider that the Accommodation Campus Design Principles as contained within Table A.1 Of 8.1(A) Main Development Site Design and Access Statement Part 3 of 3 (REP5-075] fails to give sufficient weight to the purpose of the AONB designation. The AONB Partnership awaits with interest how the applicant responds to the Examining Authorities question to them LI.2.0 reproduced below about changes to the National Planning Policy Framework and in particular paragraph 176 that includes:</p> <p><i>...to ensure specifically development within their settings should be limited and sensitively located, where permitted, which avoids or minimises adverse impacts on designated areas.</i></p>

			<p>The AONB Partnership reproduces and comments on specific principles as follows:</p> <p><i>2. Development contained within the land to the east of Eastbridge Road, reducing the visual and heritage impact, including those on the setting of the AONB.</i></p> <p>The AONB Partnership considers that containing the development to the land east of Eastbridge road reduces the negative impact on heritage assets. It considers that there are only marginal benefits to the AONB as the develop is in the setting or adjacent to the AONB.</p> <p><i>4. Visual impact of the accommodation blocks, including that on the setting of the AONB, minimised by limiting heights to four storeys.</i></p> <p>The AONB Partnership considers that development of four storey buildings in the setting/adjacent to the nationally designated AONB does not adequately demonstrate regard to the purpose of the nationally designated landscape.</p> <p><i>6. No built development or perceptible light spill within 15m of the eastern edge of the accommodation campus area to establish a bat corridor.</i></p> <p>The AONB Partnership would like to see evidence that no light spill will emerge to the bat corridor-it considers light coming at an oblique angle is likely to reach the bat corridor from the accommodation campus.</p> <p><i>8. Realignment of Bridleway 19 to run adjacent to Eastbridge Road. Configuration and landscape treatment to minimise views to the accommodation campus buildings</i></p>
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LI.2.0	The Applicant	<p>Revised National Planning Policy Framework (NPPF) On 20 July 2021, the Government published its revised NPPF. In respect of design, the thrust of the changes sees the inclusion of policies to achieve high quality, beautiful and sustainable buildings and places. The wording for conserving and enhancing Areas of Outstanding Natural Beauty has been modified to ensure specifically development within their settings should be limited and sensitively located, where permitted, which avoids or minimises adverse impacts on designated areas. Please provide comment on amended paragraph 176 of the NPPF and confirm how the complies.</p>	<p>No AONB partnership comment, Examining Authority question for the applicant reproduced for reference.</p>