

Dec 2020

## **Suffolk Coast & Heaths AONB Partnership comment on proposed changes to Sizewell C Development Consent Order**

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) **maintain the position it outlined within its submitted Relevant Representations** made in September 2020.

This representation is made on behalf of the Suffolk Coast & Heaths 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 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 relating to the changes to the Development Consent Order submitted as part of the planning process are outlined below in points 1-7:

- 1) The AONB Partnership considers it has **not had enough time to fully consider the proposed changes** to the Development Consent Order in the timescales available. The AONB Partnership consider it unfortunate at best that:
  - The changes were submitted a few days after the deadline for the submission of Relevant Representations.
  - That the consultation process for the consideration of these changes was limited to one month, meaning that organisations such as the AONB Partnership had very little time to come to a common view on the proposed changes.
  - That organisations such as the AONB Partnership, and we understand that many community based organisations, environmental Non-Government Organisations and others were lacking capacity. This was easily foreseeable given other Nationally Significant Infrastructure Projects that impact on the AONB and natural environment in the immediate area.
- 2) The AONB Partnership consider that a **lack of detail** in the *Consultation Document. Consultation on Proposed Changes November – December 2020* does not allow for proper consideration of the impacts of the changes on the nationally designated AONB. It has concerns about lack of:
  - Lack of detail in proposals for an enhanced beach landing facility making any assessment of impacts on the AONB is speculative.
  - Lack of detail in proposals for a temporary beach landing facility meaning any assessment of impacts on the AONB is speculative. There is little detail in terms of

- Design of temporary beach landing facility, such as dimensions, use of colour etc.
- Lighting on temporary beach landing facility.
- Assessment of noise such as from conveyor and other mechanisms for moving loose aggregate within the AONB.
- Height of structures associated with temporary beach landing facilities.
- Assessment of increased vehicle movements within the development site (inside the AONB) associated these proposed changes.

The AONB Partnership concurs with the findings of a report, in para 3.2.4, it commissioned<sup>1</sup> that state the impacts on the AONB include:

- *Loss of tranquillity, due to noise from hopper usage and movement of aggregate*
- *Further loss of tranquillity due to use of night time lighting*
- *Loss of naturalness of the coast and simple geometry through the introduction of new manmade elements*

These changes **will have negative impacts on the defined characteristics of the AONB** including landscape quality, scenic quality, relative tranquillity, relative wildness, natural heritage features.

There appears to be no detailed assessment of the impacts of the proposals in relation to the statutory purpose of the AONB, to conserve and enhance natural beauty. The AONB Partnership considers that such an assessment should be undertaken to demonstrate the applicant's duty to the purposes of the AONB.

- 3) The AONB Partnership considers that the proposals would **virtually double the width of the development site during construction** in a west to east orientation. It is considered that this would increase the impact of the development during construction phase from receptors within the AONB to north and south.

Furthermore, **the increase in vessels in near shore waters** using the beach landing facilities will negatively impact the qualities of the AONB and Heritage Coast. The AONB Partnership consider that the applicant should assess the visual and tranquillity (noise and light) implications of the proposals on receptors within the AONB. It is considered that the line of sight and direct line of noise from the temporary beach landing facility will be significantly increased.

The Alison Farmer Associates report<sup>1</sup> makes the following comment on this topic:

*The consideration of the four Temporary Beach Landing Facilities will require a comparison of the visual effects of each. Use of Zone of Theoretical Visibility for each option will help to demonstrate how a longer length of pier will give rise to increased visibility of structures in the offshore environment and thus along the coast. This will also inform how this increased visibility may affect the special qualities of the AONB*

*Particular viewpoints which will need review include: 6, 17, 26 and 31.*

- 4) The AONB Partnership considers that the proposals will have a significant impact on the experience of being in a nationally designated landscape through **a significant increase**

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<sup>1</sup> Sizewell C Beach Landing Facility: Comments on Preliminary Environmental Information, Alison Farmer Associates December 2020

**in the number of vessels in inshore waters adjacent to the AONB** and within the Heritage Coast area 24 hours a day, ie with lights in a dark area. These ship movements will impact on the scenic quality, relative tranquillity, and relative wildness of the AONB. As the Alison Farmer Associates<sup>1</sup> report puts it:

*the more activity and deliveries by barge the greater the effects on landscape character and special qualities of the AONB*

- 5) The AONB Partnership has concerns about the proposals impact on access to parts of the AONB that are currently publicly accessible, such as the route of **the Suffolk Coast Path, that may shortly become part of the England Coast Path National Trail**. The consultation document states:

*The coast path would remain open during construction, operation and removal of the temporary BLF [Beach Landing Facility] **as far as it is reasonably practicable and safe to do so.** [our emphasis]*

The **lack of detail in this statement does not allow for appropriate assessment of the impacts on access** within the nationally designated AONB, along a promoted Long Distance Route and the likely route of a National Trail.

- 6) The AONB Partnership recognises natural heritage features as part of the defined characteristics of the AONB. **The proposed crossing of the Site of Special Scientific Interest (SSSI) will have significant negative impact on both the landscape quality of the AONB and the wildlife contained within it.** The loss of SSSI to this proposal is regrettable and cannot be satisfactorily offset. The AONB Partnership considers that the best mitigation for this part of the proposal would be a SSSI crossing that incorporated a triple span bridge rather than the proposed culvert design. It considers this to be preferable as:

- This design would seek to minimise negative impacts on wildlife.

- 7) The AONB Partnership commissioned Alison Farmer Associates<sup>2</sup> to undertake a review of the proposed changes. **The report identified a range of information that was missing from the consultation document** that would be required to understand the impacts of the changes on the AONB. These are reproduced below:

- *Width and height of pier and hopper.*
- *Layout plan showing both Temporary and Permanent Piers, hopper, conveyor, access road, coastal path, sea defence, main construction site and any new temporary storage facilities for aggregate.*
- *Underpass of coastal path beneath the conveyor (noted on page 50 table 3.7 of PEI).*
- *Zone of Theoretical Visibility of enhanced beach landing facility options and in association with temporary beach landing facility – consideration of design of structures to work visually together.*
- *Assessment of cumulative effects of structures on the foreshore.*
- *Liaison with assessment of noise/vibration and recreational effects. The former should include effects on users of the Coastal Path.*
- *Confirmation that no aggregate or delivered materials will be stored on the beach and that it will be directly transported to stockpiles within the main construction site.*

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<sup>2</sup> Sizewell C Beach Landing Facility: Comments on Preliminary Environmental Information, Alison Farmer Associates December 2020

- Confirmation that no vehicular access onto the temporary beach landing facility pier is required and that the pier will only accommodate the conveyor.
- Details of proposed lighting.
- Preparation of new visualisations showing day and night time views and cumulative effects.
- Information of length of time it takes to unload a 3,000 tonne delivery from one barge.

The conclusion of the Alison Farmer Associates<sup>3</sup> report states:

- ***The proposed alterations for delivery of freight to the site especially during construction has sought to enhance the capacity for sustainable freight transport and at the same time respond to stakeholders advocating the maximum use of rail and sea. The proposed enhancement of the Permanent Beach Landing Facility and options for a temporary Beach Landing Facility seek to address this, nevertheless, they will give rise to additional structures and activity within the AONB. These proposed changes will see additional negative impacts on the defined qualities of the nationally designated in the proposed development area***
- ***The Environmental Statement identified that there would be significant adverse effects on the landscape, visual receptors and special qualities of the AONB in the vicinity of the site and along the coast to the north/south. The proposed changes to the PBLF and possible addition of a Temporary Beach Landing Facility will not alter the category of effects where they are determined as already significant adverse. However, from some locations further along the coast, the proposed changes may result in an increase in effect and this will need to be clearly set out.***
- ***In reaching an optimum balance between road, rail and sea transportation of materials it is essential that the high value of the AONB coastal landscape is given sufficient weight in decision making. It does not appear from the current documentation that an assessment of that balance has been undertaken.***
- ***The proposed changes to the Development Consent order application would increase the harm to the defined AONB qualities in this part of the nationally designated landscape. Any preferred Beach Landing Facilities proposals should demonstrate minimisation of adverse effects on the AONB through careful design and mitigation.***

The AONB Partnership considers the proposed changes to the Sizewell C will substantially increase the negative impacts on the nationally designated AONB and Heritage Coast. It cannot support the proposals in the current form due to the unacceptable level of negative impact on the nationally designated landscape.

Simon Amstutz

AONB Manager  
On behalf of Suffolk Coast & Heaths AONB Partnership

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<sup>3</sup> Sizewell C Beach Landing Facility: Comments on Preliminary Environmental Information, Alison Farmer Associates December 2020