

AONB Team Response to Examining Authority Questions 3

For the avoidance of any doubt this response is made by the AONB staff team and not one that has been endorsed by the AONB Partnership. This is due to lack of capacity to engage with the AONB Partnership and other areas of work relating to the Sizewell C project and other work streams.

ExQ3	Question to:	Question	AONB Response
HW.3 Health and wellbeing			
HW.3.1	Applicant, NE, RSPB/SWT, ESC, SCC, AONB Partnership, National Trust	<p>Displacement of Visitors</p> <p>Doc 9.94 submitted at D7 is a helpful summary of the different positions in respect of the potential for the displacement of visitors during the construction period. NE are continuing to recommend that SANG would be necessary and appropriate and this appears to be endorsed by RSPB/SWT.</p> <p>(i) In light of the continuing difference of view, please advise how you consider the effects on recreational amenity and whether the difference in figures which appears to remain, would lead to a different conclusion of effects on amenity and recreation issues.</p> <p>(ii) What do you consider would be necessary to overcome the possible adverse effects (if there are any) and how could this mitigation be secured?</p>	<p>In respect of question i) the AONB considers that a precautionary approach be taken similar to that described as the Sandford principle. Given the credibility of organisations providing the figures the Sandford Principle that can be summarised as: <i>Where irreconcilable conflicts exist between conservation and public enjoyment in National Parks, then conservation interest should take priority.</i> Although the AONB recognises that the Sandford principle relates to National Parks, given that AONBs have the same statutory purpose to National Parks, to conserve and enhance natural beauty, it is prudent to apply it to this situation.</p> <p>In respect of part ii) of the question the AONB considers it is the responsibility of the applicant to identify the necessary means to overcome adverse effects and for stakeholders to comment on the appropriateness or otherwise of the proposed measures.</p> <p>The guiding principle should reflect the mitigation hierarchy: avoidance, mitigate, minimise, compensate.</p>

ExQ3	Question to:	Question	AONB Response
LI.3 Landscape impact, visual effects and design			
LI.3.1	ESC, SCC, AONB Partnership, National Trust, Natural England	<p>Design and Access Statement – Detailed Built Development Principles</p> <p>In response to FWQ LI.2.13 and LI.2.14 the Applicant has detailed amendments to Principles 56 and 57. Please review and provide a response to the appropriateness of the additional text.</p>	<p>Given the importance of the cladding for mitigation of the project it is considered that the AONB study, <i>Selection and Use of Colour in Design</i> informs the decision and a range of stakeholders work to secure the most appropriate materials and colour to maximise mitigation. Suitable maintenance of the cladding should be a requirement on the applicant to maintain the integrity of colour.</p> <p>The external surfaces of the interim spent fuel store should draw on the AONB study <i>Selection and Use of Colour in Design</i> to inform choice of colour and be agreed by a wide range of stakeholders. The simple form should seek to be use materials compatible to nuclear requirements and recognise the location within a nationally designated landscape.</p>

ExQ3	Question to:	Question	AONB Response
LI.3.2	ESC, SCC, AONB Partnership, National Trust, Natural England	<p>Estate Wide Management Plan for the EDF Energy Estate</p> <p>At Deadline 7 the Applicant submitted an Estate Wide Management Plan for the EDF Energy Estate (Doc 9.88). Please review and comment on the content and likely effectiveness of the plan. Are you content with the wording of Requirement 5C within the draft DCO (Doc 3.1 Revision 8.0)?</p>	<p>The AONB has not had sufficient resource to fully review the Estate Wide Management Plan for the EDF Energy Estate. However, it does not that there are a number of references to the AONB within it but finds insufficient reference within the plan on how the plan would deliver on the statutory purpose of the AONB, to conserve and enhance its natural beauty, particularly its defined characteristics outlined in the defined Natural Beauty and Special Qualities document agreed between the applicant, Suffolk Coastal District Council (Now East Suffolk Council), Suffolk County Council and the AONB Partnership.</p> <p>The AONB would seek that the Government advisor on AONB matters, Natural England, was named in the wording of the requirement 5C within the draft DCO (revision 8.0) given that much of the estate is within the nationally designated landscape.</p>

ExQ3	Question to:	Question	AONB Response
LI.3.3	ESC, SCC, AONB Partnership, Natural England	<p>Associated Development Design Principles</p> <p>Please comment on the amendments made to the Associated Development Design Principles (Doc 8.3, Revision 3.0) submitted at Deadline 7, in respect of planting and hedgerows.</p>	<p>The AONB does not concur with some aspects of the development design principles in Doc 8.3, revision 3.0 submitted at deadline 7. In particular it considers reference to species-rich hedgerows to not support the conservation and enhancement of the AONB. It considers that hedgerows should be mixed to reflect the local landscape character to avoid planting species that do not reflect local landscape character. The AONB suggests the phrase: Mixed native hedgerow planting that reflects the local landscape character to replace species rich hedgerow.</p> <p>The AONB considers reference to tree and shrub planting should be caveated by reference to the choice of trees and shrubs planted should reflect the local landscape character.</p> <p>The choice of species chosen for planting should in addition to above consider the success or otherwise of planting due to the impacts of impacts of climate change and known diseases.</p>

Simon Amstutz
AONB Manager. Sept 2021