



Together Against Sizewell C

TOGETHER AGAINST SIZEWELL C (TASC) WRITTEN REPRESENTATION

SIZEWELL C PLANNING APPLICATION INQUIRY (IP no. 20026424)

LANDSCAPE AND AONB ISSUES

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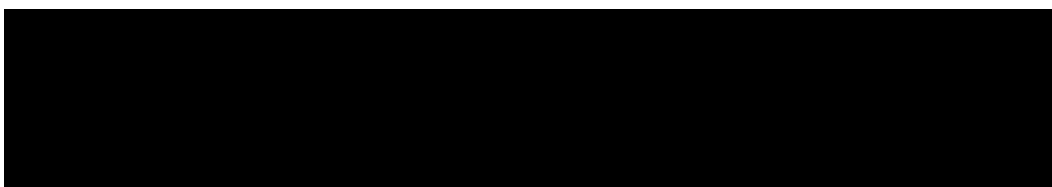
Summary: This report was written by members of Together Against Sizewell C and examines the impact the Sizewell C development will have on the Suffolk Coast and Heath Area of Outstanding Natural Beauty with reference to the loss of amenity and a reduction in the ability of the area to provide key functions such as ‘relative wildness’, tranquillity and relatively dark skies.

1. SZC will be sited at the heart of Suffolk Coast and Heaths Area of Outstanding Natural Beauty (the AONB) on a Heritage Coast. AONBs are established as an area that is recognised by the United Kingdom government as having national importance. This importance is reflected in its designation under the National Parks and Access to the Countryside Act (1949). The primary statutory purpose of the AONB is to, *“Conserve and enhance the natural and cultural heritage of the UK’s Areas of Outstanding Natural Beauty, ensuring they can meet the challenges of the future”*. The AONB status affords the area legal protections under the Countryside and Rights of Way Act 2000 (the CRoW Act) and the National Planning Policy Framework (NPPF).

2. Section 85 of the CRoW Act states, *“In exercising or performing any functions in relation to, or so as to affect, land in an Area of Outstanding Natural Beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty”*.

3. S. 172 NPPF states, *“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 status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks.”*

4. With regard to the Suffolk Heritage Coast, S.173 NPPF, as revised in 2018, states: *“Within areas defined as Heritage Coast planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate unless it is compatible with its special character”*.



5. The AONB lists its attributes as:-

- a. Landscape quality
- b. Scenic quality
- c. Relative wildness
- d. Relative tranquillity including relatively dark skies
- e. Natural Heritage Features
- f. Cultural Heritage assets

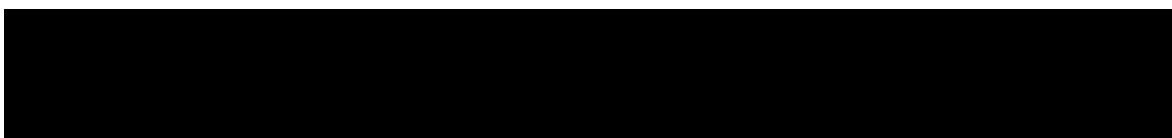
6. EN6 Volume 2 Annex C: paragraph C.8.73 says, “*the Appraisal of Sustainability has found that there is the potential for some long lasting adverse direct and indirect effects on landscape character and visual impacts on the Suffolk Coast and Heaths AONB, with limited potential for mitigation.*” **TASC wish to remind PINS that the Appraisal of Sustainability was based on at least one reactor being built over a 5-6 year period on a development site of 117 hectares whereas the current SZC proposal is for two reactors being built over 12-14 years (including the relocation of Sizewell B facilities) on a main development site of over 370 hectares.**

7. Sizewell C, if ever built, will scar the AONB as no other development in the area has done before. Sizewell C is designed to be an exceptionally large construction housing not one but two ‘EPR’ design reactors, referred to by its French designers as ‘prototype’ plants, hugely powerful, highly complex and largely untried.

8. Unlike Sizewell A which is in the process of being decommissioned or Sizewell B whose dome has achieved iconic status, the Sizewell C plants will be grey, monolithic concrete slabs creating a blot on the landscape which will be visible from all angles and from a far distance, creating a vast and highly visible industrial complex within the AONB.

9. By no stretch of the imagination can the Sizewell site which is designated for the Sizewell C development be considered suitable for the planned development. There is an obligation on decision-making authorities to uphold the AONB’s legal protections when considering planning applications. The unique qualities the AONB offers to the community, to visitors and the nation at large of space in which to regenerate and relax will be compromised by the planned development. Long term adverse impacts are acknowledged to be unavoidable should planning permission be granted, diminishing the ability of the area to continue to meet the requirements of its designated statutory purpose. The protected nature of the AONB seems to have been routinely and casually ignored by the authorities involved in the planning process for the benefit of the developer and to the detriment of the community the AONB serves.

10. The greatest threat to the integrity and viability of the AONB is the unavoidable fact that in order to construct Sizewell C, over 12 million tonnes of aggregate and other material will need to be delivered to the site, which is in a remote part of the country, each delivery of material necessitating a 500+ mile round trip as most of the aggregates are to be sourced from the West Country. Delivering such a huge amount of material is, of itself, a Herculean task which will add significantly to the carbon debt associated with the construction phase of the development, to the disruption of daily life for thousands in East Suffolk as the expected daily road traffic increases to 900-1,500 HGV trips per day, together with the buses, cars and light vans adding further thousands of vehicles a day to unsuited country roads. The construction of the access road is expected to take two to three years, the nuclear plant 12+ years. Every activity over those periods



of time will need to be illuminated during the winter months and in the hours of darkness. Every activity will cause noise, dust, and disturbance. Life in and around what should be an area of tranquillity and peace will be sheer hell for a long period of time.

11. In TASC's opinion, SZC will:

- substantially increase the industrialisation of the AONB, detracting from the attributes giving rise to its designation (tranquillity/wildlife value/scenic beauty/landscape value/relative wildness/dark skies);
- require the building of a 7.3 metre high (to be adapted to 10.5 metres in due course) causeway across/through Sizewell Marshes SSSI, with a culvert of indeterminate size (various widths and lengths are given in the DCO documentation) with 3m high barriers, which will further intrude into the landscape.
- spoil the Heritage Coast skyline/profile with dominant industrial buildings, high chimney stacks and additional 4 pylons, on a large platform raised to 7.3 metres AOD, and adversely affect the scenic beauty with a 100m permanent beach landing facility and a 500m temporary (8-10 years) jetty (which will introduce a built environment visible from a great distance).
- cut the AONB in two with a new access road from the B1122 to the SZC site.
- result in the loss of large amounts of woodland including 46 hectares in Goose Hill alone where the Applicant proposes to build a 1,370-space car park, with additional woodland lost in Kenton Hills, St James Covert, wet woodland and the already destroyed Coronation Wood.
- harm many international and national designated wildlife habitats including those associated with RSPB Minsmere and beyond.
- introduce spoil heaps, accommodation blocks, 36m high (+3.5m high stack) power generation plant into the AONB hinterland during the construction period
- introduce a dominant, up to 16 metres high, concrete sea wall of indeterminate width and structure, which will be exposed when the soft sea defences are washed away in future storm surges.
- introduce soft sea defences that will be built approximately 40 metres further seawards than the existing bund creating coastal squeeze, with the intention of replacing this feature each time it gets washed away adding more material to an unstable coastline and the constant maintenance will introduce plant and machinery activity into a tranquil environment.
- harm the historic rural landscape by converting productive farmland into the Sizewell Link Road and roundabouts, breaking up multi-generational farms.

12. The Applicant professes to be aware of the importance of protecting the environment, but their actions show that they have a callous disregard for the landscape and wildlife as well as the people that live within the AONB. By their own admission EDF allowed Coronation Wood to fall into a state of neglect, and then they cleared it before getting all the necessary wildlife licences from Natural England. The wood was destroyed in December 2020 and January 2021, in direct contradiction to the Code of Construction Practice that is mooted for the Sizewell C plans and which includes a recognition that ground disturbance should be avoided during the winter hibernation season, typically October to February inclusive. TASC refer PINS to the attached article about events at Coronation Wood that was published in War on Wildlife on 8th March 2021- see

<https://waronwildlife.co.uk/2021/03/08/george-millins-sizewell-nuclear-reptiles/> In TASC's view this demonstrates that for all their talk, EDF care nothing for the



environment around Sizewell and sets a worrying precedent for the Sizewell C development if it gains approval.



See below a small extract from The National Biodiversity Network¹ on the loss of biodiversity from this country. The Sizewell C construction can only exacerbate this dire situation and mitigation proposals from EDF simply will not result in biodiversity gain. It cannot be genuinely mitigated against. Loss of habitat in UK.

13. *‘Since the 1970s, it has been shown that 41% of all UK species studied have declined.*

14. Some groups are faring worse than others. For example, 26% of the UK's mammals are at a very real risk of becoming extinct, while 22% of seabird species studied have declined in the last five decades.

15. On a species level, the figures are even more shocking. Since the 1950s the number of hedgehogs has declined by 95%, while turtle doves have crashed by 98% and even numbers of the common toad have fallen by 68%’.

16. **TASC are concerned about the lack of visualisations** in the DCO documentation that cover: the anticipated appearance (day and night) of the various development sites throughout the AONB during the construction phase; the use of the SSSI crossing/access road by HGVs during operation; use of the BLFs during construction; use of the permanent beach landing facility during operation.

CONCLUSIONS

17. The above aspects of the development combined with others too numerous to list here, will introduce light, noise, vibration, dust, air pollution and a massive built environment causing harm to all of the attributes that gave rise to the designation of the AONB. Given the relatively low-lying nature of the AONB's landscape, SZC's industrial buildings and infrastructure will have a significant adverse impact on the scenic beauty and landscape value of the AONB during both construction, operation, and decommissioning. Tranquillity, dark skies, relative wildness, and designated wildlife habitats/species will all have significant adverse impacts. **TASC's opinion is that these impacts will threaten the integrity of the AONB's status. Given the significant adverse effects this project would have on the visual receptors, landscape, and special qualities of the AONB, great weight should be given to these.** It seems that the Applicant, in a desperate attempt to reduce the unacceptably high HGV movements has, in the late changes, introduced proposals that will be detrimental to the AONB, such as the temporary jetty and enhanced beach landing facility, without weighing the potential benefit of those changes against the need to protect the AONB.

¹ <https://nbn.org.uk/stateofnature2019/>.

18. TASC take the opportunity to remind PINS of the UN's definition of sustainable development which is now embedded in the NPPF: "Sustainable development is defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs" and consider if Sizewell C meets this definition.

19. TASC endorse the concerns expressed in the representations made by the AONB partnership.

