



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 5 – *23 July 2021*

Written summary of oral case

ISH 5 Landscape and Visual Impact and Design, 13 July 2021

East Suffolk Council 20026200

ISH 5 Landscape and Visual Impact and Design

Agenda item	East Suffolk Council submissions
<p>1. Introductions</p>	<p>Speakers on behalf of East Suffolk Council (ESC):</p> <p>Andrew Tait QC Nicholas Newton, Arboriculture and Landscape Manager Robert Scrimgeour, Principal Design and Conservation Officer</p>
<p>2. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)</p>	<p>Much of the proposed development lies within the Suffolk Coast and Heaths AONB and will have a direct adverse impact on the designated area during construction and operation. Furthermore, during construction the temporary accommodation campus, caravan site and development on land east of Eastlands Industrial Estate which lie outside but adjacent to the AONB, will adversely affect the setting of the AONB.</p> <p>In addition to the permanent land-take associated with the development, the construction laydown area straddles the entire width of the AONB and has a direct impact on recreational enjoyment of the AONB coast and hinterland, as well as disrupting important wildlife corridors. Lighting from the temporary construction area will have a direct impact on local dark sky areas. There are limited opportunities for screening these works.</p> <p>The prominent coastal location of the main development site will give rise to adverse landscape and visual impacts both in the immediate locality and further afield in respect of elevated viewpoints such as Dunwich Heath and RSPB Minsmere. Such impacts will arise during construction, and through operation to decommissioning.</p> <p>The various adverse landscape and visual impacts will adversely affect a number of the defined special qualities of the AONB.</p>

<ul style="list-style-type: none"> • Impact of the Main Development Site on the AONB and the ability to continue to deliver its statutory purpose 	<p>However, ESC also notes that post-construction, outside the area of permanent land-take, the proposed restoration of the remainder of the EDF estate from agricultural land to semi-natural landscape highly characteristic of the area will be beneficial.</p> <p>Impact on statutory purpose of AONB</p> <p>ESC considers that as the relevant statutory body for AONBs, Natural England is best placed to advise the ExA on the impact of the Project on the statutory purpose of the AONB.</p>
<p>3. Landscape and Visual Impact Assessment (LVIA)</p> <ul style="list-style-type: none"> • Adequacy of LVIA • Provision of additional construction phase visualisations through the construction phase 	<p>ESC considers that the scope and methodology of the LVIA are appropriate, subject to certain caveats set out in the Initial Statement of Common Ground (see SoCG [REP2-076], pages 71 – 76). ESC will consider the updated design proposals for the sea defence works which are expected at Deadline 5 and will comment on any landscape and visual impacts arising from those designs in due course.</p> <p>It should be noted that a number of the conclusions of the LVIA are dependent on the implementation of mitigation described in the OLEMP. Requirement 14 of the DCO requires the submission and approval of a landscape and ecology management plan in respect of the main development site, which must be in general accordance with the OLEMP. Requirement 22A requires works comprising the Two Village Bypass and Sizewell Link Road to be carried out in general accordance with Ecology Management Plans for those particular works (noting these should be LEMPs, rather than just dealing with Ecology and that they do not currently exist, although OLEMPs have been produced). It will be important to ensure that appropriate mitigation is secured through those plans so that landscape and visual impacts do not exceed those identified in the ES.</p>

	<p>Provision of additional construction phase visualisations through the construction phase</p> <p>ESC is satisfied that the plans and visualisations provided to date are sufficient. However, it notes that further visualisations may assist other interested persons, particularly those without access to professional landscape expertise.</p>
<p>4. Role of a design champion, design review panel and design code</p> <ul style="list-style-type: none"> • Position of Applicant and consideration of suggested benefits of roles/code to project 	<p>Role of a design champion, design review panel and design code</p> <p>ESC wishes to ensure that the design of the proposed development is subject to independent design scrutiny prior to the submission of design details to the LPA. This can be achieved through various models such as a Design Champion or a Design Review Panel.</p> <p>Independent design review was successfully adopted by SCC in respect of the Third Crossing in Lowestoft NSIP (PINS reference TR010023). In that case, Design Council CABE appointed a design champion to objectively critique the quality of detailed design as it was being produced. The role was invaluable in providing interested parties with confidence that agreed design principles would not be lost or watered down as the development proposed from application to detailed design stage.</p> <p>In this case, ESC considers that it would be appropriate to draw on the existing design review infrastructure available in Suffolk in the form of the RIBA Suffolk Design Review Panel, which consists of architects, landscape architects and other relevant experts. The role of the Panel would be to provide the Applicant with independent guidance prior to the submission of detailed designs to the LPA.</p>
<p>5. Outage car park location and use of pylons</p>	<p>Outage Car Park – Location</p> <p>ESC accepts the operational and security rationale for the proposed location of the outage car (MDS1 of SoCG p7, [REP2-076] and in written response [REP3-060].</p>

<ul style="list-style-type: none"> • Strategic decision-making process and justification • Alternatives and position of the Applicant • Monitoring and mitigation measures 	<p>Pylons</p> <p>ESC's position on pylons is set out in the LIR (LIR paragraphs 6.46-6.50 [REP1-045]) and in written responses [REP3-060]. ESC accepts the Applicant's evidence that there is no acceptable alternative to the proposed pylons. ESC is, in principle, opposed to additional pylons on the MDS but accepts that their visual impact is not likely to be significant in terms of their additional effects in comparison to the impact of the development of MDS as a whole.</p> <p>ESC remains concerned that alternative options to overhead power lines at the Sizewell C site will result in expansion of the nuclear platform. This would result in pressure to extend the platform eastwards – towards the coastline, or westwards towards the Site of Special Scientific Interest (SSSI). Extending the nuclear platform eastwards towards the coast would add to existing concerns regarding the position of the proposed sea defences on the shoreline. Extending the platform westwards would result in additional loss of SSSI which ESC cannot support.</p> <p>ESC is engaged in discussions with the Applicant on measures to address residual impacts on the landscape arising from the additional pylons through compensatory measures funded by the Applicant.</p> <p>ESC agrees that any alternative to the proposed pylons that has potential to cause harm through release of harmful gases would not be appropriate from a climate change perspective.</p> <p>Monitoring and Mitigation Measures</p> <p>During construction there will be regular meetings of the Environment Group who will monitor the construction works. No specific monitoring measures other than this are currently proposed.</p> <p>During operation, no monitoring is currently proposed. ESC anticipates that there will be an expansion of the existing Sizewell B landscape group to encompass the C station and wider Sizewell estate. It is not clear how this will be secured at present.</p>
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	<p>There is embedded mitigation in the project such as bunding around the TCA to mitigate noise and provide an element of screening. There has also been advanced planting in some locations such as close to the main site entrance roundabout but it is not possible to fully mitigate the impacts on the landscape arising from the development. As such, ESC is proposing a Natural Environment Fund to be provided by the Applicant to address residual impacts and compensate for harm arising on the protected landscape. The principle of the Fund has been agreed but its scale is subject to ongoing discussion.</p>
<p>6. Main development site design considerations</p> <ul style="list-style-type: none"> • Additional design principles to be included within the Design and Access Statement • Design and scale of turbine halls, operational service centre and skybridges • Colour considerations and finishes • Night-time lighting effects • Proposed design of Sizewell C power station and effect on 'iconic' status of 	<p>Additional design principles to be included within the Design and Access Statement</p> <p>ESC seeks amplification of six Key Design Principles proposed by the Applicant. ESC considers the principles set out in Table A.1 [APP-587] are not sufficiently robust, precise, nor comprehensive.</p> <p>We would like to see principles 1, 2, 4, 9, and 10 made more robust and expanded to include the following:</p> <ul style="list-style-type: none"> • The design shall minimise impacts on neighbouring amenity • The design shall demonstrate sustainability in its choice of materials, methods of construction, servicing, deconstruction, removal and site remediation post-occupation • The design shall result in a positive user experience in respect of the quality of the built environment, open spaces, on-site uses and internal connectivity • The design shall include multi-functional green infrastructure which encourages the health and well-being of workers • The design shall bring a coherent architectural narrative to all the distinct elements of the campus: accommodation blocks, reception, recreation building and decked car park. <p>At ISH5 we were asked to comment on the design principles for the accommodation campus as set out in Table A.1 of Appendix A of the Design and Access Statement table [REP2-040]. Having now reviewed the submission from the Applicant, ESC can confirm that we are satisfied with the proposed amendments to the Key Design Principles for the Accommodation Campus and are pleased to note that all of our suggested additions have been incorporated.</p>

<p>Sizewell B power station</p> <ul style="list-style-type: none"> • Coastguard Cottages – adequacy of LVIA and proposed mitigation • Design and location of beach landing facilities and additional suggested requirement • Location of accommodation campus, additional design commitments and requirement • Coastal defences – visibility of sheet piling, use of rock armour on the Northern Mound and effectiveness of landscaping • Location and height of borrow pits/spoil heaps and impact on neighbouring residential 	<p>ESC has provided commentary on 8.3 Associated Development Design Principles – Revision 2.0 [REP3-023] in our submission titled ‘ESC comments on Deadline 3 and 4 submissions from the Applicant’ submitted at Deadline 5.</p> <hr/> <p>Design and scale of turbine halls, operational service centre and skybridges</p> <p>ESC is broadly supportive of the design approach taken by the Applicant; employing high quality architects for design of elements where design is less constrained by nuclear regulatory requirements.</p> <p>Main Development Site – Notwithstanding the design and finish of the proposed buildings, they remain at-scale industrial structures in a designated protected landscape, the impact of which cannot be mitigated (LIR paragraph 14.2 [REP1-045]). The conclusions as to landscape and visual impacts in the LIR remain valid in respect impacts arising from the overall scale, bulk, and appearance of the project.</p> <p>The Council considers that Sizewell B’s dome established a benchmark for good nuclear design in a sensitive and protected landscape. As such, the Council is disappointed that the design quality will inevitably be lower for Sizewell C, driven by the fact that the design of the nuclear components is fixed. In particular, ESC regrets that the dome of Sizewell B will be obscured or compromised in some key views. This makes it all the more important that the Natural Environment Fund is adequate to mitigate those harms (LIR paragraph 14.11 [REP1-045]).</p> <p>The design approach taken for the non-nuclear components of the site (excepting pylons and overhead lines) is supported.</p> <p>The choice of cladding for the turbine halls is a sophisticated one: the thin-ness and visual lightness of the material itself will form an intriguing contrast with the certainty and inertia of the concrete nuclear island.</p>
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<p>locations• Effectiveness of landscaping proposal in Pillbox field</p> <ul style="list-style-type: none"> • Monitoring and mitigation 	<p>There is a symmetry in the layout of the set piece buildings on the Island and their use of a vertical ordering of facades, incorporating the language of plinths, for example, and a hierarchy of scale. The geometric configuration of the layout and composition of buildings is translated into the geometry of their applied appearance, creating symmetry in design. The degree of consideration applied here is welcome and reflects both the Over-arching Design Principles in relation to being a master-planned composition and the intentional broad symmetry in plan form.</p> <p>The design of the Operational Services Centre building shows a refined and sophisticated approach with depth of thought and consideration applied to ensure a good design outcome.</p> <p>The design of the main access building is overly-utilitarian for a structure that acts as a gate lodge at the entrance to the main development site (LIR paragraph 14.25 [REP1-045]).</p> <p>There are still areas to be agreed in relation to the detailed design of the MDS. The cladding, the size of shadow gap, grid of smaller and larger shadow gaps, edge treatments at corners, parapets, and junction with the plinth storey are all areas of detail that are yet to be agreed (LIR paragraph 14.16 [REP1-045]).</p> <p>The detail of the use of glass fibre reinforced concrete panels for the plinth storeys to the turbine halls and OSC building is yet to be agreed in relation to colour and texture.</p> <p>Ancillary Buildings</p> <p>The proposed design of the ancillary and plant buildings will employ the use of a darker cladding finish and ESC is satisfied that this would allow these buildings to be visually cohesive with the wider operational platform (LI.1.35 [REP2-176]).</p>
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	<p>Colour considerations and finishes</p> <p>Provided the design respects the AONB setting and use of the AONB colour palette document, ESC has no strong views on the colour or tone of the cladding panels. The Council supports the vertical gradation in visual effect from lighter to darker.</p> <p>ESC is satisfied with the use of ‘grounding’ in the colour scheme for the ancillary and plant buildings, and considers it helps ground the buildings within the wider operational platform. The principal buildings (plinth storeys to turbine hall and OSC building) will be finished in dark coloured glass fibre reinforced concrete, and so the thematic use of darker and visually recessive colour treatment across the wider operational platform will ensure the buildings form an architecturally cohesive group with other structures, at least in terms of colour choice.</p> <p>The outlined Colour Strategy for the Accommodation Campus is well considered and an approach that we consider acceptable.</p>
	<p>Night-time lighting effects</p> <p>The Applicant assesses night-time lighting effects as part of the Environmental Statement (App 13B pts 1 and 2). The assessment follows the structure and methodology of the main LVIA and as such is considered to be acceptable. The assessment and its conclusions are informed by the submitted Lighting Management Plan (ES Book 6 Vol 2). Any amendment to the lighting proposals may therefore affect the conclusions of the ES.</p> <p>ESC notes that potential impacts of construction related lighting will be experienced over a wider area than operational lighting. It is understood that the Applicant is committed to meeting the objectives of the Lighting Management Plan during construction in order to limit these impacts as far as possible.</p> <p>ESC considers that the effects of permanent operational lighting on the main station site will not be significantly worse than those currently experienced from the B station. The B station uses older technology that has worse light spill than current LED directional lighting technology proposed for Sizewell C.</p>

	<p>Moderate concerns remain over operational lighting on the Sizewell C outage carpark and in relation to the SSSI crossing, and in relation to these areas, intelligent dark sky lighting will need to be used. It is expected that the proposed outage carpark will be used solely for that use and no other routine parking use. We expect the operator to manage this without ongoing monitoring from ESC.</p> <p>The detailed lighting schemes are proposed to be discharged as requirements. ESC is satisfied in principle that the content of the detailed lighting schemes will be in accordance with the most up to date technology in line with safe working practices, which the Applicant will be held to when discharging requirements. The best available technology is constantly improving and so the Applicant is expected to use this at every opportunity. Even utilising the best available lighting technology, there will still be a residual impact on the AONB and landscape, and ESC expects the Applicant to reduce this impact as far as possible.</p> <p>ESC is broadly satisfied with the aims and objectives as set out in the Lighting Management Plan, subject to final submission of full lighting details through discharge of requirements. However, it needs to be updated to address concerns relating to ecology (the subject of comments relating to ISH7).</p> <p>Temporary lighting is likely to create notably adverse visual effects on sensitive landscape designations in respect of TCA, LEEIA and the Accommodation Campus. ESC expects the Applicant to make use of the best and most appropriate lighting technology to minimise these impacts and mitigate light spill through other means such as screen planting wherever possible.</p> <p>Lighting should be designed and deployed to prevent nuisance. Whilst operational lighting at the station is unlikely to cause a nuisance (but should still be considered) lighting at Associated Development sites and particularly Temporary Construction Lighting on all sites has the potential to cause nuisance to nearby receptors. Lighting should be designed and deployed in such a way as to prevent this and complaints of nuisance will need to be investigated by ESC/the Applicant and resolved where appropriate.</p>
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	<p>Proposed design of Sizewell C power station and effect on ‘iconic’ status of Sizewell B power station</p> <p>Sizewell B’s dome established a benchmark for good nuclear design in a sensitive location and protected landscape so it is disappointing that the design quality will be lower for Sizewell C (LI.1.42 [REP2-176]). (Lower because the domes at SZC are less rounded and will be bare concrete).</p> <p>Because the design of the nuclear components is fixed and cannot be changed, the impact of the building will therefore be more significant and will justify and require greater mitigation or compensation given its AONB setting (LIR paragraph 14.30-14.31 [REP1-045]). It is regretted that in certain key views in which the white dome/blue base design of the B station is seen in isolation or is the dominant element of the view, that this will be obscured and/or compromised by the bulk structures that make up the C station development.</p> <p>Coastguard Cottages – adequacy of LVIA and proposed mitigation</p> <p>ESC considers that the LVIA in respect of the National Trust’s Coastguard Cottages location is adequate and that the overall EDF estate management package including woodland management and replanting provides adequate mitigation. There will nonetheless be elements of the view from the cottages that will be temporarily and adversely changed with large – medium scale effects during construction, and subject to permanent adverse impacts during operation at a medium – small scale. These impacts should be reflected in the scope of any agreed compensation package. There is an overlap here with heritage impacts, which would be greater here than experienced by any other heritage asset, and where the impacts are considered by ESC to be greater than assessed in the ES (LIR, para. 12.34).</p> <p>Design and location of beach landing facilities and additional suggested requirement</p> <p>BLFs – ESC is satisfied with the adequacy of the landscape and visual impact assessment of the BLFs. The LVIA recognises that the impact of the beach landing facilities both during construction and during operation is Major and Adverse giving rise to Significantly adverse effects given the highly sensitive nature of the location. These adverse impacts together with all the residual impacts will be considered and reflected in the final agreed mitigation and compensation package.</p>
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	<p>Location of accommodation campus, additional design commitments and requirement</p> <p>The campus is proposed on land outside but adjacent to the AONB, to its western boundary. ESC considers the campus to be in the setting of the AONB considers that it has the potential to cause direct and indirect impacts on the special qualities of the AONB and on those experiencing the adjacent AONB landscape. These impacts stem from the visual impact of new buildings and additional lighting (AR.1.10 [REP2-176]).</p> <p>The presence of the campus is likely to compromise the experience of users on the adjacent bridleway. In the immediate vicinity of the campus, and predominantly for bridleway users, there will be a degree of compromise of the experience of the natural beauty of the AONB. This extent will be influenced by the final building design and proposed planting, particularly along the eastern boundary of the campus (LI.1.42 [REP2-176]).</p> <p>ESC considers the proposed landscape buffer including running track around the periphery of the accommodation campus will somewhat soften its visual impact. The location of the accommodation campus almost serves as a visual buffer before the Main Development Site.</p> <p>The layout plan for the campus demonstrates a significant landscaped margin and security fencing around the campus location which will reduce its impact further and maintain a physical separation from the Eastbridge Road. Current indications are that buffer planting on the eastern boundary will usefully contribute to mitigating these effects on the AONB.</p> <p>We welcome the illustrated design considerations in respect of the articulation of form and facades; the avoidance of repetitive monotony; and the use of flat roofs to restrain scale effects (AR.1.10 [REP2-176]).</p> <p>ESC welcomes the attention that is being given to other appearance considerations in terms of window and materials treatment. The final finished appearance of the accommodation blocks and associated buildings will require careful consideration (LIR paragraph 14.32 [REP1-045]).</p>
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	<p>It is clear landscape proposals have been incorporated into the layout of the accommodation campus from an early stage. The east-west orientation of accommodation buildings is considered acceptable in respect of localised impacts, and the alternating pattern of access streets and green streets is considered attractive. It is accepted that sufficient consideration has been given to the quality of intervening space, traffic distribution and habitable conditions for occupants.</p> <p>There are still areas of detail yet to be agreed. The appearance of the accommodation blocks has not yet been fully detailed. The materials and colour palette references the local vernacular, although there is uncertainty as to how this will lend itself to a modular form of construction that will have a contemporary appearance, as suggested in the design proposal.</p> <p>Edge treatment of the decked car park – yet to be finalised - will be critical in mitigating some of the effects arising from the enormous scale of what will be an urban character structure.</p> <p>Coastal defences – visibility of sheet piling, use of rock armour on the Northern Mound and effectiveness of landscaping</p> <p>ESC accepts the general indicative approach to the proposed finished appearance of coastal defences although it is understood that this matter is still under technical review and may change. In this respect the LVIA remains incomplete. At present, ESC is in agreement with the indicative approach to the coastal defences, however if the requirements of the coastal defences change this may have implications for their design and the potential for landscaping and re-vegetating.</p> <p>The function of the coastal defences takes priority over their form and design, though with appropriate re-vegetation and landscaping in accordance with the indicative appearance shown in the D&AS Pt 2 Drawing 8.27 [APP-586] their impact on the coastline can be somewhat softened. The Sizewell B coastal defences, as viewed on site, have been re-vegetated which softens their visual impact as they blend in with the coastline to a degree.</p>
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	<p>Location and height of borrow pits/spoil heaps and impact on neighbouring residential locations</p> <p>The impacts of borrow pits/spoil heaps are understood and have been adequately assessed. The borrow pits will have a significant impact as identified in the LVIA but are temporary and should be contextualised in the broader scale of construction works. The impacts of the spoil heaps are relatively brief in the timescale of the project, but in LVIA terms will be significantly adverse in their effect on local landscape character and views, albeit temporarily.</p> <p>ESC is seeking control through the CoCP of some elements associated with the spoil heaps which have a relationship with an appreciation of landscape, for example noise from vehicles travelling over spoil heaps, and lighting on the heaps.</p> <p>Effectiveness of landscaping proposal in Pillbox field</p> <p>Planting in Pillbox Field is 50% complete and has been carried out to an ESC agreed specification. It is anticipated that the remaining planting will be carried out in the autumn of 2021.</p> <p>Monitoring and mitigation</p> <p>Landscape</p> <p>ESC considers that the general principles behind current mitigation proposals from the Applicant are adequate and generally satisfactory. It would be helpful to have additional indicative detail in respect of some planting proposals, particularly in relation to the two main road schemes, but generally full details will be secured through the discharge of requirements. The underlying design principles for the two road schemes are currently under review and will need to be subject to further agreement.</p> <p>ESC has not asked for specific planting detail at this stage and considers the indicative detail broadly acceptable though it does have some concerns within the design principles which will require further consideration/investigation. There are some potential anomalies within these which will need refining and resolving. The proposed planting of elm hedges which cannot be commercially bought in this country is a key issue which illustrates ESC's concern on the lack of detail at the present stage.</p>
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	<p>Full details of wider compensation funds and their underlying principles of application continue are the subject of ongoing discussions.</p> <p>Design</p> <p>Good design in itself is a form of embedded mitigation that we support (LIR paragraph 14.39-14.41 [REP1-045]).</p> <p>ESC seeks a mechanism to ensure that final design elements and materials are appropriate for the setting of the Main Development Site within the AONB, particularly in respect of the turbine halls, the OSC and the main access building serving as a gateway to the estate.</p> <p>ESC seeks a similar such mechanism for the final design and materials of all of the Accommodation Campus buildings and associated landscape, including the Recreation Building. The mechanism that we prefer would be a Design Review Panel, preferably the Suffolk Design Review Panel.</p> <p>These mechanisms are detailed in our ESC's (20026200) Response to the Examining Authority's First Round of Written Questions (LI.1.1 [REP2-176]).</p>
<p>7. Sizewell Link Road</p> <ul style="list-style-type: none"> • Design considerations, including night-time lighting effects • Update on Pretty Road bridge design 	<p>Design considerations and location</p> <p>ESC has no role in critiquing the design of highway schemes – they are engineered and thus SCC has the appropriate expertise in this area. However, ESC is able to comment on road schemes from a landscape perspective (and ecological – see ISH7).</p> <p>Night-time lighting effects</p>

<p>alterations and implications for LVIA</p> <ul style="list-style-type: none"> Monitoring and additional mitigation suggestions 	<p>ESC suggests that at discharge of requirements stage, lighting options of primarily the least amount of upward, but also lateral light spill are secured (LI.1.88 [REP2-176]). Planting options to address lateral light spill should also be considered. There are separate ecological concerns which are addressed under ISH7.</p> <p>Update on Pretty Road bridge design and LVIA</p> <p>ESC notes the additional benefits that a vehicle road bridge on Pretty Road can make to maintaining local connectivity. The LVIA will need to be updated accordingly to account for the additional impact of a road bridge compared to a pedestrian bridge, although ESC anticipates that the degree of change will be not give rise to significantly additional adverse effects.</p> <p>Monitoring / additional mitigation</p> <p>No further comment at this stage.</p>
<p>8. Southern Park and Ride</p> <ul style="list-style-type: none"> Design considerations, including night-time lighting effects 	<p>Design considerations and location</p> <p>ESC has no role in critiquing the design of highway schemes – they are engineered and thus SCC has the appropriate expertise in this area. However, ESC is able to comment on road schemes from a landscape perspective (and ecological – see ISH7).</p> <p>ESC has no significant outstanding concerns with the design aspect of this AD site. The design of buildings within the AD site will be covered by the AD design principles and discharged through a requirement. It is</p>

<ul style="list-style-type: none"> Monitoring and additional mitigation suggestions 	<p>anticipated that the Applicant will make every effort to meet its lighting strategy principles to minimise night-time light spill by using the most up to date and effective lighting technology.</p> <p>Monitoring / additional mitigation</p> <p>Further consideration of these matters can be undertaken as part of the discharge of requirements. ESC suggests that at discharge of requirements stage, lighting options of primarily the least amount of upward, but also lateral light spill are secured. Planting options to address lateral light spill should also be considered (LI.1.83 [REP2-176]).</p> <p>ESC accepts that the described tree and hedge planting would generally be successful in minimising the visual impact of the SLR in views from the surrounding landscape and would integrate with the surrounding landscape (LI.1.120 [REP2-176]).</p> <p>Screening mounds and new planting have been described in the ES and full details can be agreed at discharge of requirements stage, as necessary, along with lighting strategies. It is anticipated that as much new planting as possible can be left as legacy planting after completion and therefore its nature and location will need to be suited to the prevailing local landscape character.</p>
<p>9. Two Village Bypass</p> <ul style="list-style-type: none"> Design considerations and location 	<p>Design considerations and location</p> <p>ESC has no role in critiquing the design of highway schemes – they are engineered and thus SCC has the appropriate expertise in this area. However, ESC is able to comment on road schemes from a landscape perspective (and ecological – see ISH7).</p>

<ul style="list-style-type: none"> Monitoring and additional mitigation suggestions 	<p>ESC's primary concerns with regard to the Two Village Bypass relate to impacts on the historical environment which we have highlighted in our written submissions and do not intend to go into the detail of this today.</p> <p>ESC considers that there is one particular visual impact issue arising from the southern Two Village Bypass roundabout and its presence in the visual connection between Parkgate Farm and Farnham Parish Church, that requires further consideration and mitigation/compensation (LI.1.99 and HE.1.48 [REP2-176]). It is ESC's view that the proposed landscape measures within the oLEMP [APP-588] would be inadequate to minimise the impact of the proposed new roundabout adjacent Parkgate Farm on the wider setting of and intervisibility between St Mary's parish church.</p> <p>Monitoring / additional mitigation</p> <p>No further mitigation is considered necessary at this stage in respect of landscape mitigation for the Two Village Bypass (LI.1.106 [REP2-176]), beyond that set out in Section 6.5 [APP-421].</p>
<p>10. Mitigation and controls</p> <ul style="list-style-type: none"> Draft DCO Requirement 14 Draft DCO Requirement 22A Draft DCO Requirement 24 Relevant schedules contained within proposed s106/Deed of Obligation 	<p></p> <p>Requirement 22A:</p> <p>Requirement 22A relates to landscaping works at the Associated Development sites. However, the wording of the requirement currently refers only to the submission and approval of ecological management plans rather than landscape and ecological management plans. If the intention is for this requirement to cover landscaping, then it will require re-drafting to reflect this, with reference to an oLEMP or LEMP</p> <p>Furthermore, requirement 22A currently only includes the Two Village Bypass (Work No. 11) and the Sizewell Link Road (Work no. 12). It should also include the northern and southern park and ride facilities and the freight management facility.</p>

	The requirement should require submission to and approval by ESC (rather than SCC) given ESC's landscape remit.
	Requirement 24: ESC has no comment on this requirement.
	Relevant schedules: The Natural Environment Fund is agreed in principle. Discussions as to the quantum of the fund are ongoing.
11. Close of hearing	