

The Sizewell C Project, Ref. EN010012

**Issue Specific Hearing 5 (13 July 2021) – (ISH5)
Landscape and Visual Impact and Design**

**Post Hearing Submissions including written
summary of Suffolk County Council's Oral Case**

Suffolk County Council Registration ID Number: 20026012

Deadline 5

23 July 2021

Issue Specific Hearing 5 (13 July 2021) - (ISH5) Landscape and Visual Impact and Design

Post Hearing Submissions including written summary of Suffolk County Council's Oral Case

Note: These Post Hearing Submissions include a written summary of the Oral Case presented by Suffolk County Council (SCC). They also include SCC's submissions on all relevant Agenda Items, not all of which were rehearsed orally at the ISH due to the need to keep oral presentations succinct. The structure of the Submissions follows the order of the Agenda Items but within each Agenda Item, the Submissions begin by identifying the main points of concern to SCC and then turn to more detailed matters.

Examining Authority's Agenda Item / Question	Suffolk County Council's Response	References
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings		
Agenda Item 2 Impact of the Main Development Site on the AONB and the ability to continue to deliver its statutory purpose		
The Challenge to the Statutory Purpose of the AONB	SCC draws attention to the statutory context of the duty imposed by s.85(1) of the Countryside & Rights of Way Act 2000, which requires the Secretary of State as a 'relevant authority' within s.85(2)(a) to have regard to the purpose of conserving and enhancing the natural beauty of the AONB when performing any function that would affect land within the AONB. That duty applies to the determination of a DCO application as much as it does to any other statutory function. SCC notes and endorses the concerns expressed by Natural England about the effects of the proposal on the statutory purpose of the AONB and in particular its view (in REP2-153) that 'most certainly the sizeable area occupied by the power station buildings and ancillary infrastructure would no longer contribute to the statutory purpose' (p.44). SCC also makes the point that because of the scale and visual dominance of the proposal, the effects on the AONB statutory purpose are not limited to the footprint of the development but will undermine its essential characteristic of 'natural beauty' (which is not limited to landscape and visual matters as explained further below) over a far wider area. SCC considers that the proposal, as presented to date, is, as identified in	<u>Local Impact Report REP1-045</u> para 6.10 Local Impact Report Appendix 1.19 Natural Beauty and Indicators of AONB <u>REP1-079</u> (NB and SQ)

	<p>EN-6, a significant challenge to the purposes of the AONB designation. The Council in common with the Applicant considers that the natural beauty of the designation that the 2000 Act seeks to conserve and enhance, is articulated by the Natural Beauty and Special Quality Indicators of the Suffolk Coast and Heaths AONB. This document [APP-217] was developed by the Applicant jointly with the AONB Partnership. SCC notes that there is no statutory definition of 'natural beauty' but it is agreed in APP-217 that the natural beauty indicators affected by the proposal include landscape quality, scenic quality, relative wildness, relative tranquillity, and cultural heritage. Thus impacts on all of these matters go directly to the extent to which the AONB is able to fulfil its statutory purpose. In addition, APP-217 recognises impacts on AONB special qualities, including for health/well-being of those using and experiencing rights of way and permissive routes in the AONB. SCC considers that there is a need to take a holistic approach looking at all of the effects on the AONB when assessing the extent to which the proposals will undermine its statutory purpose.</p>	
<p>Spatial extent of Landscape and Visual impacts - main site - during construction and operation - <i>based on the project as presented to date</i></p> <p>The Significance of the Landscape and Visual Impacts by virtue of their spatial extent</p>	<p>The assessment as set out in Vol 2 Main Development Site Ch 13 Landscape and Visual (APP-216) and in summary paragraphs 13.6.139 - 13.6.144 and 13.6.145 - 13.6.150 for the construction phase and 13.6.311 - 13.6.315 and 13.6.316 - 13.6.32 for the operation phases and acknowledges the spatial extent and magnitude of landscape and visual effects on the AONB where they occur informed by a full appreciation of the AONB's natural beauty and special qualities as recorded in the Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators at REP1-079</p> <p>The area impacted by the development is, as identified by the applicant at 13.6.3.16 (APP-216), a small percentage of the total area of the AONB and therefore, the applicant argues that the "overall effect" on the designated area is limited. SCC does not consider that a quasi-mathematical/numeric approach to assessing the significance of the impacts is particularly meaningful given that the AONB is designated as a whole as a coherent single entity and the significance of the adverse effects <i>where they occur</i> is substantial, to the extent NE consider that the s82(1) purposes of designation, are <i>significantly compromised</i>.</p>	<p>Initial Statement of Common Ground SZC Co./ESC/SCC REP2-076 LV5</p> <p>APP 216</p> <p>REP1-079</p> <p>REP1-045</p>
Impacts on the Reasons for Designation	<p>SCC notes the comments of Natural England on page 41 of its Written Representation (REP2-153), in respect of the extent and significance of the harm identified by the</p>	REP2-153 p41

	<p>applicant in the LVIA, that “the capacity of this area to continue to deliver the AONB’s statutory purpose would be significantly compromised and across more than a limited extent”.</p> <p>SCC defers to NE as the Statutory Adviser to Government on protected landscapes in respect of the matter of Statutory Purpose.</p>	
Impacts on the perception of the AONB	<p>Furthermore, it is recognised by both SCC and the applicant in the SoCG REP2-076 that some effects of the proposal fall outside the strict scope of landscape and visual impact assessment, but that these impacts do need to be recognised and addressed. Therefore, matters related to wider <i>perception</i> of the whole AONB, as both a designation and destination, and what is required as an appropriate response through the Deed of Obligation are being discussed with the applicant. SCC sees the need for an adequate package of mitigation (which term embraces not only measures to avoid or reduce adverse impacts but also measures which offset (or compensate for) adverse impacts), in line with the mitigation hierarchy.</p> <p>At ISH5 the Applicant in oral submissions (from Mr Rhodes) sought to draw a distinction between mitigation and compensation and suggested that the Natural Environment Fund to address residual impacts was directed at the former. SCC does not agree that compensation for inevitable residual impacts on the AONB falls outside of the scope of mitigation or outside of the scope of what the Applicant should be expected to address. SCC notes that ‘mitigation’ is not a term defined in the Infrastructure Planning (EIA) Regulations 2017 but that para 7 of Schedule 4 of the EIA Regulations expects an ES to describe ‘the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment’. This description recognises that there can be different forms of mitigation. Some measures eliminate (avoid/prevent) adverse effects, others minimise (reduce) adverse effects which cannot be eliminated, and others compensate for (offset) adverse effects which can neither be eliminated nor minimised. Since prevention/avoidance is preferable to minimisation, and minimisation is preferable to compensation, it is reasonable to see this as a mitigation hierarchy. However, there is nothing in the EIA Regulations to suggest that offsetting should not be sought or</p>	<u>REP2-076</u> LV7

	<p>provided where there are residual adverse effects that cannot be avoided or reduced. Whether any particular measure will serve to offset such residual impacts (and to what degree) is a matter for planning judgment, but SCC considers there is no in principle objection to seeking to offset residual impacts by compensatory measures.</p> <p>SCC also notes that even within the discipline of LVIA the same approach is taken to the breadth of what can be regarded as mitigation (see p.95 of Chapter 5 on landscape assessment and p.118 of Chapter 6 on visual impact assessment of the Landscape Institute and IEMA's Guidelines for Landscape & Visual Impact Assessment (3rd edition). In both of those references proposals for offsetting or compensating for adverse effects are referred to as a type of mitigation.</p>	<p>GLVIA 3rd edition, pp.95,118, by: Landscape Institute, Institute of Environmental Management and Assessment [please contact SCC to arrange for entry into the examination library if required]</p>
<p>Treatment of the Heritage Coast</p> <p>PRW/TDK</p>	<p>SCC is satisfied that approach taken by the applicant to dealing with the <u>Heritage Coast Definition</u> is acceptable</p>	<p>SCC response to ExQ1 LI.1.3 <u>REP2-192</u></p>
<p>Response of the project design to the sensitivity of the receiving landscape</p>	<p>The quality of the design of the power station is compromised by the inflexibility on changing the design of nuclear components approved through the Generic Design Assessment by the Office of Nuclear Regulation. In the context of Sizewell C and its location within the AONB, the Council considers the design of these fixed components sub-optimal given the sensitivities of its AONB location.</p> <p>Sizewell B's dome established a benchmark for good nuclear design in a sensitive location, so it is disappointing that the design response cannot be equally agile for this project.</p> <p>Furthermore, SCC considers that the Applicant has not given appropriate weight to the sensitivity of the receiving environment with respect to the power export solution proposed, controls for the design of non-nuclear buildings and the location of the outage car park within the AONB, as set out in the Local Impact Report [REP1-045] at section 7 and Table 2, and in SCC's Written Representation (REP2-189) submitted at Deadline 2</p>	<p><u>REP1-045</u> para 14.11</p> <p><u>REP1-045</u> section 7 and Table 2 <u>REP2-189</u> Chpt4</p>

Impacts of the sea defences on the character of the coastal landscape	The design, extent and composition of the sea defences remain unresolved at present, therefore the extent and nature of the adverse impacts on the character of the coastal landscape are not yet clear. SCC notes the information regarding soft coastal defences (Rep3 004) and beach recharge (REP3-032 & REP3-048) submitted by the applicant at deadline 3. This information indicates additional risks to the character and amenity of the coastal frontage. However, SCC asks to reserve its position until publication of further information by the applicant at Deadline 5.	REP3-032 REP3-048 Rep3 004
Agenda Item 3 - Landscape and Visual Impact Assessment (LVIA)		
<i>Adequacy of LVIA – Assessment</i>	<p>SCC anticipates that the LVIA will require further revision, (like that already undertaken in respect of the revised Beach Landing facilities (AS 206)). Following the publication of details of the sea defence design, at Deadline 5 - It is anticipated that this is likely to resolve the LV5 - 6 and 8 regarding <i>adequacy of assessment</i> in the SCC/ESC Joint Statement of Common Ground REP2-076</p> <p>Whilst significance of adverse effects is currently at the highest level and is not expected to change, the impact of the revised sea defence design, in terms of character and the qualitative, experiential issues, and vegetation cover, needs be understood and evaluated particularly given the importance of this area as public realm.</p>	REP2-076 LV5 6 & 8
<i>Need for updating of the LVIA in respect of sea defences</i>	Therefore, an update of the “Visualisation of the sea defence” Figure 8.27 in part 2 of the DAS APP-586 will also be required	APP-586 p199
<i>Adequacy of LVIA - scope and methodology</i>	SCC is satisfied that the <i>scope and methodology</i> of the LVIA is acceptable.	REP2 – 76

Provision of additional Construction Phase visualisations through the construction phase	The additional work by the Applicant in relation to visualisation and representation of construction, at the Main Development site is welcome, as it will aid wider understanding of the visual effects during construction	<u>REP 2-192</u> EXQ 1 LI.1.4
Agenda Item 4 - Potential roles / need for a design champion, design review panel and design code		
	<p>Whilst a Design Champion has the potential to contribute to consideration of sustainable design issues this would probably need to be incorporated into the discharge of requirements related to design which is a matter for ESC (East Suffolk Council).</p> <p>A design review panel to review the detailed design to support the discharging Authority has the potential to provide useful comment on sustainable design issues. It could include bodies such as the AONB Partnership and Natural England. This was supported in the LIR (para 14.41)</p> <p>A design code type document has the potential to establish useful parameters and support the discharge of requirements and test any minor modifications that may be made to the finishing and detailing discussed with discharging Authority, particularly given the length and complexity of this project. However, SCC defers to ESC on these matters</p>	<p><u>REP 2-192</u> EXQ 1 LI 1.1</p> <p>[REP3-045] LIR para 14.41</p>
Agenda Item 5 – Outage car park location and use of pylons		
SCC position regarding application all reasonable endeavours in consideration of alternatives	<p>Introductory comments</p> <p>The Council is principally concerned with approach that the applicant has not made all reasonable endeavours in consideration of alternatives in respect of a) proposals for the electrical connection between the turbine halls and the NGET (National Grid</p>	EXQ1 LI 1.2 <u>REP 2-192</u>

	<p>Electricity Transmission) substation b) the consideration of alternatives for outage parking.</p> <p>Para 5.9.9 of EN-1 recognises that AONBs have ‘the highest status of protection in terms of landscape and natural beauty’ and that the conservation of natural beauty should be given ‘substantial weight’ when considering DCO proposals within an AONB. Unlike the Applicant (oral submissions from Mr Jones at ISH5) SCC sees no material distinction between ‘substantial’ weight in EN-1 and ‘great’ weight in para 176 of the NPPF (2021).</p> <p>In relation to alternatives, SCC notes the Applicant’s multiple references to section 4.4 of EN-1 but does not see this guidance as providing an adequate explanation for the Applicant’s failure to take further measures to reduce what SCC maintains are avoidable harmful impacts on the AONB. In the first place, SCC notes that neither the Power Export Connection nor the parking arrangements are part of the GDA fixed components. In the second place, SCC notes that the Applicant is continuing to refine its proposals where it considers it appropriate to do so, in order to minimise or avoid harmful effects, as recently illustrated by the proposals at D2 to reduce the width of the permanent SSSI crossing post-construction. In the third place, were the Applicant to engage now with the issues raised by SCC there would be time within the pre-decision period for design work to be undertaken to as to implement alternative arrangements without impacting on the Applicant’s construction programme. It would also be open to the ExA to make a Procedural Decision requesting the Applicant to provide further information on the feasibility of such alternative designs so that the outcome of that work could inform the Examination.</p> <p><u>SCC position regarding Pylons & Outage Parking</u></p> <p>It the SCC’s position that in respect of the electrical connection and outage parking, the applicant has not reasonably and demonstrably considered alternative measures. The Council considers that, particularly taking account of the view of Natural England that the purpose of the AONB designation is at risk, (as discussed at agenda item 2), it is necessary that the Secretary of State has demonstrably and robustly met the s85(1)</p>	<p>[REP 3-046]: Applicant’s D3 comments on responses to ExQ1</p> <p>[APP-216] & [APP-217] LVIA</p> <p>[REP 3-046]: Applicant’s D3 comments on responses to ExQ1</p> <p><u>REP2-153</u> p41</p> <p><u>REP 2-192</u></p>
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	<p>duty (CRoW Act 2000) to <i>“have regard to the purpose of conserving and enhancing the natural beauty”</i> of the AONB designation when making his decision on this proposal.</p> <p>SCC notes the applicant's critique of their response to ExQ1 LI.1.50 in respect of Pylons and concedes that a description, in alignment with the applicant's LVIA, would be that;</p> <p><i>the proposed pylons and overhead lines contribute to the adverse residual impacts of the Main Development Site, on the character and special qualities of the Suffolk Coast and Heaths AONB.</i></p> <p>However, SCC consider this contribution is likely to be avoidable and that exploration of this issue is especially important because the design flexibility of the main site is limited to just a few areas, consequently opportunities to minimise the adverse impacts of the scheme on the AONB are restricted.</p> <p><u>Detailed comments regarding Pylons and Outage Parking</u></p> <p><u>Pylons</u></p> <p>SCC and its consultants AFRY consider that the use of GIL appears to be a viable, and significantly less impactful, alternative to pylons and overhead lines. This is explored in detail in SCC's Written Representation submitted at Deadline 2, and we refer the ExA to this document for further detail.</p> <p>The Written Representation has appended the AFRY report from September 2020 on the DCO submission information (Appendix WR4a). Further appendices provide commentary from SCC and AFRY to updated technical reports from the Applicant, in Appendix 4b and 4d.</p> <p>Based on the response by the Applicant to SCC's WR, there is still no agreement on opportunities that there may be to use Gas Insulated Lines in a combination of troughs and above ground routes as an alternative to pylons. While it is accepted that there</p>	<p>LIR p28</p>
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	<p>are already pylons in existing views of the power stations at Sizewell, SCC considers that the impact on the special qualities of the AONB (and the Purposes of Designation) should be minimised by not adding new and prominent examples where there could be alternatives.</p> <p>During the course of the Hearing, the Applicant appeared to agree with a number of points made by SCC's consultants, AFRY, that there were fewer technical impediments to the use of alternatives to pylons than had been the case previously. Further detail on this was promised by the Applicant at D5. SCC sets out its consideration on the alternative approach in its response to comments on the WR.</p> <p>Whilst the Applicant might raise a concern that SCC has not demonstrated a final design that can be shown to work for its preferred Power Export Connection, it is clear that it is an alternative that has been studied by the Applicant and it cannot be regarded as vague or inchoate. SCC has provided a considerable level of technical detail to show how such a solution could be achieved but it is unrealistic to expect SCC to have designed a fully worked up scheme for this aspect of the Applicant's proposal. It is entirely legitimate for a DCO to be granted with a degree of flexibility to enable a project to take advantage of future technological advances or developments, provided that the parameters of that flexibility have been adequately assessed (as is recognised in paras 103-104 of the DCLG Planning Act 2008: Guidance on the Pre-Application Process). A GIL Connection would in SCC's view be in principle achievable within the parameters already assessed. A requirement which allowed the final form of the Power Export Connection to be subject to post-consent approval within the parameters assessed in the Examination, coupled with a need for the Applicant when seeking the discharge of that requirement to prioritise a GIL Connection unless that was not feasible, when a default Connection of Pylons would then be permitted, would ensure that the Applicant gave proper consideration to the less harmful option of GIL at the final design stage but would also have no impact on project timetable.</p>	
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	<p><u>Outage Parking</u></p> <p>The SCC view on this is set out in full in our WRs but in summary, the Applicant intends to provide two separate car parks for outage staff, one each for Sizewell B and Sizewell C. Both would be in the AONB. SCC argues that the occasions when both would be needed simultaneously are likely to be extremely infrequent and when this does happen, other temporary arrangements could be made for parking of staff. SCC notes that it is inherent in the Applicant's proposals (two outage car parks to service three reactors) that the Applicant already accepts the risk that there could be two unplanned outages at the same time as a planned outage, without that risk justifying a third outage car park. SCC has also been unable to identify any assessment of the effects of two simultaneous outages in the ES which would imply that the likelihood of such an event is of a very low order. It would conclude that the use of the outage car park for SZC is not appropriate or required and therefore would be contrary to EN-1.</p> <p>In the discussions at the Hearing, the Applicant agreed to provide further information at D5 on the risk level of more than one outage taking place at a particular time. Notwithstanding this, SCC has put together a proposal for the means by which alternative provision could be made. This is reported more fully in a separate submission for D5</p>	
Strategic decision-making process and justification		
Alternatives and position of the Applicant		
Monitoring and mitigation measures		
Agenda Item 6 – Main development site design considerations		

Additional design principles to be included within the Design and Access Statement	<p>It is understood that additional principles & an updated DAS are to come at D5. Subject to what might come forward then. in respect of the turbine hall, governed by Requirement 11, SCC would propose that further guidance is given on the range of colours to be used on the cladding for the turbine halls as was intended by para 6.17.9 of the Main Site Design and Access Statement (APP-585). SCC considers that this could be provided as part of the Detailed Design Principles Table 5.3.</p> <p>In respect of the prominent interim spent fuel store, SCC considers that, rather than the very thin detail that has been given through the maximum height parameter and the design principles, there should be a greater detail given at this time so that the Examining Authority can properly judge its impact.</p> <p>A fuller response on this matter is set out in the response to the Applicant's comments on SCC's answers to ExQ1 on LI.1.12</p>	
Design and scale of turbine halls, operational service centre and skybridges	See note above	LIR (REP1-045) WR (REP2-189)
Colour considerations and finishes	See note above.	
Night-time lighting effects	SCC considers this matter has been significantly progressed by the provision of <u>REP3-057 Technical Note on Indicative Lighting Modelling</u> , the Council is content that the effect of permanent and temporary lighting and its impacts can be adequately controlled by the Discharging Authority.	<u>REP3-057</u>
Proposed design of Sizewell C power station and effect on 'iconic' status of Sizewell B power station	Overall SCC agrees with ESC's disappointment about the overall outcome of the design process and in respect of the point about ensuring an absence of "clutter", would say that the use of pylons runs counter to this principle.	
Coastal Defences	Nothing to add further to that stated at agenda item two	
Coastguard Cottages – adequacy of LVIA and proposed mitigation	The long-term management of new planting on the northern Mound and the management and replacement of existing plantation woodlands that partial screen and integrate the site into the view from this location are critical mitigation	

Design and location of beach landing facilities and additional suggested requirement	Although the temporary beach landing facilities have an additional impact on the AONB, access and amenity during construction, SCC considers that these additional reversible harms are outweighed by the transport and consequent amenity benefits of additional capacity to move material by sea	LIR (REP1-045) and WR(REP2-189)
Location of accommodation campus, additional design commitments and requirement	<p>i. Impact on the AONB: The Campus is outside the AONB but adjacent to it therefore it has the potential to have an impact on those experiencing the adjacent AONB landscape. Given that it is adjacent to the construction area for the project, it contributes, in combination with the construction laydown area, to the adverse impacts on the AONB during the construction phase of the project.</p> <p>ii. Effect on tranquillity: As the proposed accommodation campus would both be adjacent to the AONB and serve as the locus of significant activity. However, SCC also acknowledges that any effects of the accommodation campus on tranquillity and local amenity must be balanced against any transport benefits from the reduction of commuting distance for non-home-based workers.</p> <p>Matters of detailed design and requirements Defer to ESC</p>	<p>EXQ1 LI1.42 <u>REP 2-192</u></p> <p>EXQ1 AR.1.10 <u>REP 2-192</u></p>
Coastal defences – visibility of sheet piling, use of rock armour on the Northern Mound and effectiveness of landscaping	Nothing to add in addition to agenda item two – pending further information at deadline 5	
Location and height of borrow pits/spoil heaps and impact on neighbouring residential locations	The construction site will be approximately 250 metres from the village of Eastbridge, the borrow pits will be the closest element of construction to the village. It is essential that these are managed appropriately to minimise impacts on local residents - This is also the case in respect of spoil on the Land east of Eastlands industrial Estate.	LIR para 36.19 <u>REP 1-045</u>

Effectiveness of landscaping proposal in Pillbox field	SCC considers that subject to effective implementation and maintenance woodland planting in this location will, in due course, contribute to the visual screening of the power station infrastructure	EXQ1 LI1.16 <u>REP 2-192</u>
Monitoring and mitigation	SCC considers that all reasonable and proportionate controls should be applied to the design of the ancillary buildings, in particular the Intermediate Spent Fuel Store (ISFS), and that this should, in line with the recommendations of the Design Council review (APP-587), be included in the detailed component of the DCO.	
Agenda Item 7 – Sizewell Link Rd		
Design considerations, including night-time lighting effects	<p>SCC considers that the design principles in respect of the Link Road require revision in order to form a robust basis for the discharge of requirements. The applicant SCC (and ESC) intend to resolve these issues prior to Deadline 6, if possible</p> <p>SCC has examined the 'plans for approval' and 'plans not for approval' except for those submitted at deadline 3. SCC have also been provided with feasibility plans for highway design of the various road schemes although these are primarily highway design and contain limited information regarding the landscape aspects of the project. In addition, it has examined the Associated Development Design and Access Statement (as revised) and the oLEMPs for the Two Villages Bypass and Sizewell Link Road. It has a number of detail concerns about some of the practicalities of the specifics of these documents and has agreed to hold further discussions with the Applicant and East Suffolk Council with the expectation that these can be resolved. Due to the project complexity and an evolving design a full review of plans and drawings will be required before these become certified documents to ensure consistency across the plans for individual topics. One general concern though that is not perhaps so readily resolved is the on-going maintenance of some parts of the landscaping. While the scale of the landscaping is necessary to mitigate the impact of the road schemes and SCC is</p>	<u>REP2-076</u> LV33-34-35

	<p>content to act as the discharging authority for Requirement 22A, it will not wish to take on various parts of this within its highway responsibilities. To be more specific, the Council would only wish to be responsible for land within approximately 2m of any highway structures, cuttings or embankments. Much of the landscaping for these roads extends beyond this land. In addition, there are a number of parcels of land isolated by the road schemes but not shown for any particular landscaping function. It will be important for there to be a mechanism to ensure the long-term maintenance of all of these areas and we have yet to have discussions with the Applicant on this.</p> <p>SCC is content that lighting issues can be dealt with at the at detailed design & discharge of requirements stage</p> <p>On the broader point of the long term adverse impact on landscape of an additional road, the issue of the balance that has to be drawn between the consequences of removing and retaining it are addressed in SCC's WR</p>	
Update on Pretty Road bridge design alterations and implications for LVIA	Having reviewed the public consultation material SCC is content that, as set out by the applicant, the proposed change would not introduce any new significant landscape and visual effects.	EXQ1 LI.1.88 REP 2-192 https://www.edfenergy.com/sites/default/files/sizewell-c-project_consultation-document_june-2021_compressed.pdf
Monitoring and additional mitigation suggestions		
8. Southern Park and Ride		

Design considerations, including night-time lighting effects	Following discussions between the community and the applicant and modifications to the detailed scheme SCC is satisfied that this outline proposal can be controlled by the Discharging Authority	
Monitoring and additional mitigation suggestions	SCC defers to the discharging Authority	
9. Two Village Bypass		
Design considerations and location	As with the issues addressed for the SLR in Agenda Item 7, SCC considers that the design principles in respect of the Two village Bypass require revision in order to form a robust basis for the discharge of requirements. The applicant SCC (and ESC) intend to resolve these issues prior to Deadline 5 if possible	REP2-076 LV33-34-35
Monitoring and additional mitigation suggestions	<p>SCC is aware of the discussions taking place between the Applicant and the local residents to seek to reduce the impact on the closer properties. It would welcome such changes and trust that these will look at noise as well as visual issues. It will wish to look at the outcome of this more closely to assess whether it adequately deals with the local issues as we raised in our response to ExQ1 LI.1.106 and NV.1.49</p> <p>Also, see points on oLEMP being raised in Agenda Item 7 which are also relevant here.</p>	SCC response to ExQ1 LI.1.109 and NV.1.49 REP 2-192
10. Mitigation and controls		
Draft DCO Requirement 14	Defer to ESC	
Draft DCO Requirement 22A	Looking more closely at Requirement 22A, we see that though in the dDCO (Rev 4) it is headed Associated Development: <i>Landscape</i> Works, the text only refers to the Two Villages Bypass <i>Ecology</i> Management Plan. The same is the case with the SLR. Now the only documents that we have been able to find that appear to correspond to those are the Two Villages Bypass oLEMP and SLR oLEMP, submitted by the Applicant in January. There is no definition of the two Ecology Management Plans in the draft DCO.	

	<p>In requirement 14(1)(vii) (main site) the reference is to a landscape and ecology management plan, and that it will be prepared in general accordance with the measures set out in the Outline Landscape and Ecology Management Plan. The Outline Landscape and Ecology Management Plan is a certified document in Schedule 22.</p> <p>We would ask (a) if the references in 22A should be references to Landscape and Ecological Management Plans (b) whether 22A will be amended to say that those plans will be prepared in general accordance with the two OLEMPs accepted for examination on 22 January and (c) the OLEMPs will be certified documents, like the main site one.</p> <p>At the Hearing, East Suffolk Council raised the issue that it considered that it should discharge this Requirement. SCC takes the strong view that, given that the landscaping on highway land has an important bearing on safety along the road and that the Local Highway Authority will be responsible for its maintenance and management in the long term, it should be the discharging authority.</p>	
Draft DCO Requirement 24	<p>If the SCC proposal for temporary use of the SLR rather than permanent is accepted by the SoS, then this Requirement would need to be amended to include the SLR's removal and reinstatement.</p> <p>While there is a mechanism for determining the date of completion of highway works through the measures in Article 20, there is no definition of when "completion" will be achieved for Works 1A and 1D or 1E. It is suggested that the Applicant confirms this through written confirmation to ESC.</p>	
Relevant schedules contained within proposed Deed of Obligation		

Associated Development Design principles Rev 2 <u>REP3-023</u>	SCC considers that the design principles in respect of the Two village Bypass and Link Road require revision in order to form a robust basis for the discharge of requirements. The applicant, SCC (and ESC) intend to resolve these issues prior to Deadline 6, if possible	Initial SoCG SZC Co./ESC/SCC <u>REP2-076</u> LV33-34-35
Effect of temporary and permanent lighting at the Main Development Site (and Associated Development Sites)	SCC considers this matter has been significantly progressed by the provision of <u>REP3-057</u> <i>Technical Note on Indicative Lighting Modelling</i> , therefore subject to further minor clarification in respect of the Freight Management Centre (see response to ExQ1 LI.1.12 <u>REP 2-192</u>) the Council is content that the effect of permanent and temporary lighting and its impacts can be adequately controlled by the Discharging Authority.	<u>REP2-076</u> LV10 & LV36 <u>REP 2-192</u> LI 1-12 EXQ1